#### FULTON INDUSTRIE INC. 135 East Linfoot Street, W seon, Ohio 43567 419 335-3015

Contact Changed to Darl Fouty, Plating 419335 3015
April 29, 1982

April 29, 1982

Map

Q,T,TSO, PA

OHD 09 4810 736

RCAA Activities

US EPA Region 5 P.O. Box A3587 Chicago, Ill. 60690

Attn: Lisa Binder

RECEIVED

MAY 6 1982

WASTE MANAGEMENT BRANCH EPA, REGION V

Dear Ms. Binder:

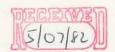
We would suggest that you contact Mr. Darl Fouty (or myself) on any questions or recommendations you have regarding the EPA program at our facility.

Mr. Fouty has a knowledge of the chemical content, etc., of our plating solutions and can better answer any questions of a technical nature.

leney

R. N. Cheney Vice President of Manufacturing FULTON INDUSTRIES INC.

RNG/mnp



# November 16,1988 9:30 am Date and Time of Inspection

## RCRA INTERIM STATUS INSPECTION FORM

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		IIWFAB #
GENERAL INFORMATION		U.S. EPA I.D. POND WHEND TOL
FIRM TUNINA	e: 43567-0377 County: Fulton Te	City: <u>Whason</u> lephone: <u>419- 335-3015</u>
(Name)  1. Nom Blacker)  2.	INSPECTION PARTICIPANT(S)  (TIETE)  Finishing Manager):	(Telephone) 419-335-3015
3	INSPECTOR(S) Onio EPA-invironmental Enginee	N 419-352-8461
Mark One If	INSTALLATION ACTIVITY the site is a TSDF, check the boxes indicating w	hich areas were reviewed.
Generator only (G)  Transporter (T)  TSDF only	General Facility Standards. Preparedness and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure	<pre> // Waste Piles S03  // Land Treatment D81  // Landfills D80</pre>
	7 Tanks S02/T01 7 Surface Impoundments S04/T02	Chemical/Physical/ Biological TO4  Groundwater Monitoring
	/ Incineration/Thermal Treatment	. /_/ Post-Closure

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		Yes	<u>No</u>	N/V	<u>Remark</u>
9	lias the facility submitted a Part A to Ohio?	<del>(presidentially</del>	$\swarrow$	- General Contracts	Security of the second
	If "yes", is it complete and accurate?	<del>giagniti/Propint</del>		$\frac{\mathcal{S}}{\mathcal{S}}$	qualitative of the state of the
3.	Has the facility submitted a Part B?	X	<u> </u>	wa.	
4.	Was advance notice of the inspection given? If so, how far in advance?  IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.	·			

REMARKS. GENERAL INFORMATION
Include a brief description of site activity and waste handling.

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40_	CFR 262 (DAC 3745-52) GENERATOR REQUIREMENTS				nem
<b>********</b>		<u>Yes</u>	<u>No</u>	N/A	Remark #
1.	The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	$ \boxtimes $		wat o designation to	·
2.	Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	esselve tombolis	<u> </u>	<del>çanqueli 21/20</del>	<b>⊕</b> essymmetry day
3.	Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	appyopinish	selentas retros	quanethilisti (b	· ·
4.	The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
	a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	esses veznephth	V.	<del>COLUMNY DES</del> ERT	Opposite contract of the contr
	b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<u> </u>		trought	tion-year-tidii
_	c) Prepared manifests have been signed by the generator and initial transporter. in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<u> 100</u>	e <del>construit</del> s	ents võis transpap	day, philosomorphy (1971)
	d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<del></del>	Y	<del>Qidilina sap</del>	anna shirida i ili mandara e e e e e e e e e e e e e e e e e e
	e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<del>@Westlands</del>	D	<del>azyotytia</del>	q

	<b>S.</b>		
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	•	Yes	<u>Mo</u>	M/A	Remark #
5.	The generator meets the following hazardous waste pre-transport requirements:				
<i></i>	a) Prior to offering hazardous wastes for transport off-site the waste material is packaged. labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	X	n—	- Andrews	Committee of the second of the
	b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	$\mathcal{S}$	ego <del>mprodit</del>	gtisS	etterstein-Alfigmenthissinke community (A SSA 60)
	c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	. \( \sigma \)	quantificate	***************************************	whereage is all to harm which the recent that the statement is
6.	Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	<del>- 100000</del>	$\searrow$	ggu <del>nnaladd)</del>	erzanskie (D. Diene erzoch (D. American)
7.	If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
	a) The containers are clearly marked with the words "Hazardous Waste".	$\mathcal{L}$	<del>(************************************</del>	фікурунченій	eguministagementa permuny (Anto-
	b) The date that accumulation began is clearly marked on each container.		Quantition (P	<del>composite</del> ®	Company of the Compan
8.	The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees			•	
	within 6 months and providing an annual training program refresher course.  (Section 262.34) [3745-52-34(A)(4)]		<del>(2-21)</del>	<del>(1,111)</del>	agenesis de la constitució de
9.	The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented [3745-52-34(A)(4)].	· construction	<u>&gt;&gt;</u>		11
#1	29 CFR 1910.1200 training.	1 , )			
سلہ ۳۰	29 CFR 1910.1200 training (training for meeting OSHA requirements one	y)		<b>Rev</b> i	sed 12/84

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NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS. GENERATOR REQUIREMENTS

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		Yes	ЙŌ	Ĥ\V	Remark_/L
	Subpart C: Preparedness and Prevention				
١.	Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]	D MONTH	$\searrow$		SASS SERVICE ASSESSMENT CONTINUES ASSESSMENT
2.	If required due to actual hazards associated with the waste material, the facility has the following equipment: $(265.32)$ [3745-65-32(A)(B)(C)(D)]				
	a) Internal alarm system.	$\underline{\mathcal{K}}$	Spage & Allemany Span		CONTRACTOR OF THE PROPERTY OF
	b) Access to telephone, radio or other device for summoning emergency assistance.	<u> </u>	ion remos	egydege-i	Company of the Compan
	c) Portable fire control equipment.	ot  ot	eneritanis	den kanenso-kadda	Effethelessee Bairs and as harmon Barman Ma
	d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	$\nearrow$			
3.	All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	<u> </u>	della de Companyo de Compa	de la State e e e e e e e e e e e e e e e e e e	Debilished Chross***********************************
1.	If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	<u> </u>			7
5.	If required due to the actual hazards associated with the waste material, adequate alsle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	<u>×</u>			#100000 HE ALL THE STREET
<b>ნ</b> .	If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37( $\Lambda$ )]	$\searrow$	Comband Shirt		
7.	Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]	e	B-V-LOCATION	<u>×</u>	-

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			<u>Yes</u>	<u>No</u>	N/V	<u>Remark #</u>
		Subpart D: Contingency and Emergency				
	fire	facility has a written Contingency Plan designed to minimize hazards from e, explosions or unplanned releases of hazardous wastes (265.51) 45-65-52(A)(B)(C)(D)(E)] and contains the following components:				
	a)	Actions to be taken by personnel in the event of an emergency incident.	Ŋ	<del>el-entrasson,</del>	<del></del>	
	b)	Arrangements or agreements with local or state emergency authorities.	m-avamb	$\searrow$	·	
(**	c)	Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	<u> </u>	<del>@///</del>	<u> </u>	
	d)	A list of all emergency equipment including location, physical description and outline of capabilities.	<del>18-3110-10-1-1</del> -1	<u>X</u>		8-110-11-11-11-11-11-11-11-11-11-11-11-11
	e)	If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]	• • • • • • • • • • • • • • • • • • •	<u>X</u> )	ga en automa	
2.	h-a-	opy of the Contingency Plan and any plan revisions is maintained on-site and has n submitted to all local and state emergency service authorities that might be uired to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]	×		dawaliki 450 mai 40	
3.		plan is revised in response to facility, equipment and personnel changes failure of the plan. (265.54) [3745-65-54]	<u> 10</u>		to-motorum-to	
1,	fam	emergency coordinator is designated at all times (on-site or on-call) is liar with all aspects of site operation and emergency procedures and has the hority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]	<u> </u>		<del>20-44-107-</del>	***************************************
5.	a 1 1	an emergency situation has occurred, the emergency coordinator has implemented or part of the Contingency Plan and has taken all of the actions and made all the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)		Oreillatermine	$\searrow$	

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# Subpart 1: Management of Containers

	Subpart 1: Management 5:	Yes	<u>No</u>	N/A	Remark #
٦.	Hazardous wastes are stored in containers which are:	$\varphi$			g-complete (Albam) kilome
	a) Closed (265.173) [3745-66-73(A)]	$\mathcal{S}$		_	No.
	h) In good physical condition (265.171) [3745-66-71]			gainti(ismi)	· ·
	c) Compatible with the wastes stored in them (265.172) [3745-66-72]	$\searrow$	<del>Quine, sing</del>		<u> </u>
	Containers are stored closed except when it is necessary to add or remove wastes (265.173(a)) [3745-66-73(A)]	<u>×</u>	<del>day</del>	<del></del>	quare from the famous many
	Hazardous waste containers are stored, handled and opened in a manner which provents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	$\sum_{i=1}^{n}$	gassandard)	<del>(Maria Carata</del>	quantification - Association -
	The area where containers are stored is inspected for evidence of leaks or corrostorate at least weekly and such inspections are documented. (265.174) [3745-66-74]	·N	$\searrow$	<del>(maisterna)</del>	CONTRACTOR OF THE PROPERTY OF
	Containers holding Ignitable or Reactive waste(s) are located at least 50 reet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	<u>£</u> .	danstopment	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	who control to the co
6.	Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	2	<del>apenda serb</del> i	<del>(poperation</del>	Colombian - Accomplying

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### RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility:	-ulton Ins	untries		
U.S. EPA I.D. 1	No: OHD OG	1 810 736		
Street:	35 Cast Lings	ot Street		
City: Uh	usion Sta	te: Ohis	Zip Cod	e: <u>43567-0</u> 377
Telephone:	419-335-	3015		
Operator:	,			A STATE OF THE STA
Street:				
City:	Sta	te:	Zip Cod	C
Telephone:	-			
Owner:			US THE REAL PROPERTY OF THE PR	
Street:			100 mil 44 6 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4 4	- Cy-
City:	Sta	te:	Zip Cod	e:
Telephone:	MILESCONIA CONTRACTOR OF THE STATE OF THE ST		10000000000000000000000000000000000000	
Inspection Dat	e: <u>                                    </u>	Dan Weat	her Conditions:	oil)
	<u>Name</u>	Affiliation	Telepho	
Inspectors:	Oznet Leite	Onio PA	4/19 - 3	352-8461
Facility Repre	sentatives:			
	***************************************			
	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator	<u></u>	entermination with the second		<u> 5006</u>
Transporter		garanti de la constanta de la		
Treater	ar-to-reference in the control of th	announced delivery of the second of the seco	***************************************	uzsusyummamana maneeti
Storer				
Disposer	***************************************			

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### INSPECTION SUMMARY

# RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

				Gen.	Treat	Store	Disp.	Trans.
A.	F-S	olvent Was	<u>tes</u>					
	1.	F001					<del></del>	
	2.	F002	•	<del></del>				
	3.	F003			-			-
	4.	F004						
	5.	F005						
		Note:	Use Appendix misclassifying			ther the fa	cility is	•

#### B. California List Wastes

I. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

	Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L			**************************************	
Cadmium	100 mg/L		<del></del>		
Chromium VI	500 mg/L				*
Lead	500 mg/L				
Mercury	20 mg/L		***		
Nickel	134 mg/L				
Selenium	100 mg/L				***************************************
Thallium	130 mg/L		*****		

2.	Liquid hazardous waste (include any solid or sludge) that contain concentrations greater than or	ins f	ree cyanid	es at	d with	
	Gen	•	Treat	Store	Disp.	Trans.
3.	. Liquid hazardous waste that he	25 2	pH of less	than or ec	qual to 2.0	
4.	. Liquid hazardous waste that co than or equal to 50 ppm		ns PCBs a	t concentra	ations great	er
	500 ppm	******		<u></u>		<del>6</del>
	Does the facility mix lique contains PCBs with other					
	Ye	:s	N	Го	NA	
	If yes, state reasons for r	nixin	g:			
5.			Cs greater	than or ec	ual to 1,00	0 mg/L
	(liquids) or 1,000 mg/kg (solid	(2)				
	Note (1): The prohibitions of waste is also subject to the sol specific HOC.	268.3 vent	32(a)(3) an restriction	d (e) do no	ot apply if ubpart C fo	the or a
	Note (2): The effective date of greater than or equal to 1,000 8, 1987; the effective date for or equal to 10,000 mg/L and s 1,000 mg/kg is November 8, 19	mg/l liqu olid	L and less id wastes o	than 10,00 containing	0 mg/L wa HOCs grea	s July iter than

### First Third Wastes

Note: (1) The detailed description for waste codes are listed in Appendix C.

(2) EPA has promulgated the treatment standards for the following waste code with \*.

	Gen.	Treat	Store	Disp.	Trans.
F006*	<u>x</u>				
F007	<del></del>			<del></del>	
F008		-			
F009					
F019	<u> </u>				
K001*	-				
K004*					
K008*	<u></u>				
K011					
K013					
K014	<u> </u>			<del></del>	
K015*			···		<del></del>
K016*	<u> </u>			<del></del>	
K017				<del></del>	
K018*			<del></del>		-
K019*	<del></del>				•
K020*	4				
K021*	<del></del>				
K022*			<del></del>		
K024*	<del></del>	<del></del>			
K025*		<del></del>			<del></del>
K030*					<del></del>
K031	<del>```</del>			••••	
K035					
K036*		<del></del>			
K037*					
K044*					
				<del></del>	
K045*	•		<del></del>		******
K046*			<del></del>		<del></del>

	Gen.	Treat	Store	Disp.	Trans.
K047°	100000000000000000000000000000000000000				
K048°			CONTRACTOR		***************************************
K049°	 CONCORDANT CONTRACTOR OF THE C	and the same of th	<del>ilitikuusiksaluuuille</del>		<del>(************************</del>
K050°	 	and the plantage of the state o		***************************************	***************************************
K051°			Collision	CHICAGO STORY CONTRACTOR	endermonia proprio
K052°	 		400 Emperiorina interprendis	€	***************************************
K060°	datement	***************************************			***************************************
K061°	QWAR-III WAR-PARAMA				
K062°	49908/III	<i>Historium</i>			Q=====================================
K069*	######################################				
K071°	\$244 Telebrian commit	- Chairming and the Chairming			
K073°			2004EN-141-0-93		
K083°		40400000000000000000000000000000000000			
K084	<b>C</b> ition and the second				
K085	4harran anna		donnerstance and a		
K086*	#Phiniparkusassussassuss		diameter and a second	francis and a second	
K087°	D-TOTAL DESCRIPTION AND REAL PROPERTY.			-	
K099°	COMMITTEE VALUE AND ADDRESS OF THE PARTY OF		dayer and the same of the same	<u> Carrente de la carr</u>	Gall Discourse
K100°	######	**************************************		4	
K101°	филиппина				
K102°	es#Qoogleeneeseeseesee	47-47-CH-Waleshiller		***************************************	-
K103*	<b>Whomesters and the second sec</b>	WARRANG TO SERVICE AND ADDRESS OF THE PERSON		***************************************	
K104°	<b>49-44402333333333</b>	-			
K106°	manuscript (construction)	**************************************	***	*************	
P001	BEREITA MONTHAND				
P004					
P005		W/m-1	-		
P010	decrease and the same and the s	<del>Quigament and a</del>	<u>Crise-surress</u>	4	
P011	timenum anne.	@history	Convenience		
P012	<del>- Orderson and the second and the s</del>	- William Control of the Control of	#40 <u>0</u>	di-constant	promitte to the
P015	40 Hill Statement and Statemen			NAMES OF THE PERSONS ASSESSED.	Environmentality.
P016		daman (production)			4,000
P018	42-40-47-1111-00-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-	47650011	- CONTRACTOR OF THE PARTY OF TH	**************************************	

		Gen.	Treat	Store	Disp.	Trans.
P020						
P030				<del></del>		<del></del>
P036	***			<del>-</del>	<del></del>	<del></del>
P037	**					
P039		<del></del>			<u> </u>	
P041			<del></del>		<del></del>	
P048		······································				
P050		<del></del>		<del></del>		<del></del>
P058		***************************************		<del></del>	<del></del>	
P059		-			<del></del>	
P063				•	<del> </del>	***************************************
P068						
P069						
P070		<del></del>	<del></del>			<del></del>
P071		-				
P081				<del></del>		<del></del>
P082					<del></del>	
P084		<del></del>	er :	*		·
			<del></del>			
P087		<del></del>	<del></del>			
P089				<del></del>		***************************************
P092						
P094		-			<del></del>	
P097		<del></del>			<del></del>	
P102	•					*****
P105		<del></del>				<del></del>
P108					. ——-	<del></del>
P110						
P115				<del> </del>		
P120			•			
P122				-		
P123						
U007						<del></del>
U009		<del></del>		<del></del>		

		Gen.	Treat	Store	Disp.	Trans.
U010		<u> </u>		territorismet historisis relaminis		<i></i>
U012		dittibionisticalistamostic	to-150	CHECKETHOCCOMMENT	ANNELS AND STATE OF THE STATE O	
U016	. v = <del>v=</del>	delle medici e e e e e e e e e e e e e e e e e e	678tratiques autorité		CHESTOCK CONTROL OF THE CONTROL OF T	
U018	-	@chinestockis@chimmer.com	que en company de la company d			
U019		@http://www.htcom/www.com/dis	***************************************	***************************************	######################################	
U022		<del>-</del>	<b>W</b> #Companies of the companies of the co	-	<u> </u>	4-4-2-4
U029	-	· · · · · · · · · · · · · · · · · · ·			Co-Street State construents	499900000000000000000000000000000000000
U031				····		#ESPECIAL DESCRIPTION OF THE PROPERTY OF THE P
U036		4020000046500004650		<del></del>	GROWN CONTRACTOR OF THE PARTY O	
U037	-		Ann-er-ann-	<del>ė-avenus autori</del>	**************************************	
U041		sinderfreezonassessonato			***************************************	
U043		40d Revelloped Accounts		<del></del>	4	
U044		*************	***************************************		Contribution with	
U046		-	444		4	
U050					«Монический»	#IPAN charmonaring
U051		<del></del>		W-1-1-W-1-CO		E-1
U053		-		· ·		
U061			Martin (Control of Control of Con	<del></del>	Constitution of the Consti	
U063		-			**************************************	
U064				-		
<b>U</b> 066		<del></del>		<del></del>		*
U067		-	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	ري چغيان پارليان الانتخاب ال	***************************************	<del>Of the Construction</del>
U074		***************************************	C		emmor-enocemes	<del></del>
<b>U</b> 077	•	Фицинорогической	**************************************	**************************************		<del>o-marconinologi</del>
U078		#14704TTT	4 <del>100000000000000000000000</del>	<u> </u>		**
U086						
U089	•	declarable with the constitution and the	Communication .		Circletonico consumbatio	
. U103		<del>Quantum Topolita Laborato</del>	44/40-Albertaneous constant	<del></del>	<del>duines concentité</del>	
U105		(1000000000000000000000000000000000000		Carried States of States on Carried States	entre and the second	
U108		40000000000000000000000000000000000000	400AAbananananana,	***************************************	Communication	and the second
U115			47-47-47-42-26-26-26-26-26-26-26-26-26-26-26-26-26	<del>4000000000000000000000000000000000000</del>	***************************************	Maria de la compa
U122		***************************************	Contract Con		-	<del>-</del>
U124		. Autoria-Control-Massivation	<del>dicin</del> us,		torocitorates	

		Gen.	Treat	Store	Disp.	Trans.
U129						
U130						
U133						
U134	· · · · · · · · · · · · · · · · · · ·					
U137						
<b>U</b> 151						
U154						
U155	`					
<b>U</b> 157						
U158						
U159						
U171						
U177						·
U180						
U185						
U188						
U192				=		
<b>U</b> 200						
U209						
U210						
U211						-
U219						
<b>U</b> 220						
U221	-					
U223						
U226						
U227		<del></del>				
U228						
U237						
U238						
U248						
U249		<u></u>				

# RCRA LAND DISPOSAL RESTRICTION INSPECTION GENERATOR CHECKLIST

#### GENERATOR REQUIREMENTS

١.		lvent Wastes: Does the generator correctly determine the opriate treatability group of the waste?
		Yes No NA
	If y	es, check the appropriate treatability group.
		Wastewaters containing solvents (less than or equal to 1% TOO by weight)
		Pharmaceutical wastewater containing spent methylene chloride
	<u> </u>	All other spent solvent wastes
2.		fornia List Wastes: Does the generator correctly determine appropriate treatment standard of the waste?
	2.	For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with
		existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?
		existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or
		existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?
	ზ.	existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?  Yes No NA
	b.	existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?  Yes No NA  If yes, specify the method:  For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other
	ზ.	existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?  Yes No NA  If yes, specify the method:  For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

			Yes	No	NA		
If yes, check the appropriate treatability group.							
<u>X</u>	∖ fiï	lterable	er (less than 19 c solids) cwaters	% TOC by w	eight and less than 1%		
List	List the waste code and check the correct treatment standard group.						
Was	te Code		Wastewa	ater	Nonwastewater		
<u>_</u> F	<i>ما</i> 00				$\wp$		
		<del></del>	<del></del>	<del></del>			
	<b>alysis</b> Sivent Wa	stes					
	lvent Wa	e gener	·	whether the	F-solvent waste		
F-Sc	lvent Wa	e gener	ator determine ent standards?	whether the			
F-Sc	Does th	e gener treatm	ator determine ent standards?	whether the	F-solvent waste		
F-Sc	Does the exceeds	e gener treatm	ator determine ent standards?	whether the	F-solvent waste		
F-Sc	Does the exceeds	e gener treatm	rator determine ent standards?  Yes determination	whether the	F-solvent waste		
F-Sc	Does the exceeds  How was	e gener treatm as this c nowled;	ator determined ent standards?  Yes  determination of the standards of the	whether the No made?NoNo data availa	F-solvent waste		
F-Sc	Does the exceeds  How was - Ki	e gener treatm as this c nowled;	ator determine ent standards?  Yes  determination of the standards and supporting is adequate.	whether the No made?NoNo data availa	F-solvent waste  NA  ble for review? Describ		

D	),	treatment standards upon generation [268.7(a)(2)]?
		Yes No NA
		If yes, specify the waste stream:
C	Po	Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?
		Yes No NA
ć	<b>i.</b>	How does the generator test F-solvent waste when a process or waste stream changes?
2. (	Cali	fornia List Wastes
8	<b>2.</b>	Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?
		Yes No NA
	b.	If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?
		Yes No NA
		What type of absorbent is used?  Check the types of waste to which absorbent is added.  Liquid hazardous waste having a pH less than or equal to 2
		Liquid hazardous waste containing metals
		Liquid hazardous waste containing free cyanides
(	C.	Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:
		- Knowledge of wastes
		Yes NoNA

	- Testing Ye	s No	NA
٠.	If yes, list test meth	nod used:	
đ.	Does the generator determined filtrate exceed cyanide a	nd metals concentra	ation levels?
	Ye	s No	Y NA
*	- If yes, list test meth levels that exceeded	nod used and constill prohibition levels:	tuent and concentratio
c.	Does the generator dilute treatment [268.3]?	the waste as a sub	stitute for adequate
	Ye	s No	<u></u> NA
Fire	st Third Wastes:		
2.	Does the generator correct standard of the waste?	ctly determine the a	ppropriate treatment
	Ye	s No	NA
	Note: The treatment sta Appendix D.		•
b.	Does the generator determined treatment standards upon	nine whether the Figeneration?	irst Third waste exceed
	Yes	s No	Soft hammer
	If yes, specify the waste	stream: <u>Foolo</u>	
-	How was this determinati	ion made?	
	- Knowledge of waste	:	
	Yes	s No	
	If yes, is any suppor	ting data available	for review? Describe

					Yes		No		NA
		œ	Total C	onstitue:	nt Analy	Sis			
					_ Yes		No	***************************************	NA
			Provide					ncy of te	
			note an	y proble	ms. Atta	ich test	results.		
c	÷,		the gen ment [26		ilute the	waste a	s a subs	stitute for	adequate
					_ Yes		No	-	NA
	đ.		does the	e genera		•		a process	
			no	cha	ra in	wast	e st	reon()	
		•							HALL D. HALL B TO COMMISSION OF STREET
								<u></u>	
Manas	gem e	n t			-				
Manas			2 n 2 c c m	· n f			· -		
1.	On-S	ite M	anagemo						
1.	On-S Is re	ite M strict	waste o	r waste dispose	that exce d on-site	eeds the	treatmo	ent standa	rds
1.	On-S Is re	ite M strict	waste o	r waste dispose	that exce	eeds the	treatmo	ent standa	rds
1.	On-S Is res treat	ite M strict ed, st	waste o ored, or	r waste dispose	that exce d on-site	eeds the?	treatmo	ent standa	rds
1.	On-S Is restreat	ite M strict ed, st	waste o ored, or	r waste dispose	that exce d on-site Yes	eeds the?	treatmo	ent standa	rds
1. ·	On-S Is restreat	ite M strict ed, st es, the	waste oored, or  TSD C	r waste dispose ————————————————————————————————————	that exce d on-site Yes must be	complet	treatme No		rds
1. ·	On-S Is rettreat If ye	ite M strict ed, st es, the Site M Does treat	waste oored, or TSD C	r waste dispose hecklist nent sandards	that exce d on-site Yes	complet	treatme _ No ed.	eds the	rds
1. ·	On-S Is rettreat If ye	ite M strict ed, st es, the Site M Does treat	waste oored, or TSD C  fanagen the ger ment st	r waste dispose hecklist nent terator sandards ity?	that exce d on-site Yes must be	complet waste the	treatmond. No ed. at exceesatment	eds the	rds
1. · · · · · · · · · · · · · · · · · · ·	On-S Is rettreat If ye	ite M strict ed, st es, the Site M Does treat stora	waste of ored, or a strong the germent strong ge facil	r waste dispose hecklist nent sandards ity?	that exced on-site Yes must be ship any to an of Yes provide n	complete waste the f-site tree	treatment	eds the or	rds
1. ·	On-S Is restreat If ye Off-	ite M strict ed, st es, the Site M Does treat stora	waste of ored, or a strong the germent strong ge facil	r waste dispose hecklist nent erator sandards ity?	that exced on-site Yes must be ship any to an of	complet  waste the f-site tree  iotification [268.7(a)	No ed. at excee atment No ion to to (1)]?	eds the or	rds

c.	Does notification contain the following?
	EPA Hazardous waste number(s) Yes Yes No
	Applicable treatment standards Yes No
	Manisest number Yes No
	Waste analysis data, if available Yes No
	Henrify off-site treatment or storage facilities: ESAT, HENITOCK CAMEROMENTOS. ENMINITE
d.	Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?
	Yes No
e.	Does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?
	Yes No
f.	Does notification contain the following?
	EPA Hazardous waste number(s) Yes Yes No
	Applicable treatment standards Yes No
	Manisest number Yes No
	Waste analysis data, if available Yes No
	Certification that the waste meets treatment standards YesNo
	Identify off-site land disposal facilities:
g.	Is the waste subject to a nationwide variance, case by case extension (268.5), or petition (268.6)?
	Yes No NA
h.	If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?
	Yes No

		If yes, does the notification contain th	e following infor	mation?
		EPA Hazardous waste number	Yes	No
		The corresponding treatment standards and all applicable prohibitions	Yes	moreover No
		Manifest number	Yes	No
		Waste analysis data, if available	Yes	No.
		Date the waste is subject to the prohibitions	Yes	No
	j	Does the generator retain copies of all a period of 5 years?	notices and certi	fications for
		_ • · · · · · · · · · · · · · · · · · ·	www.	No
D D	. <u>Demons</u>	tration and Certification "Soft Hamme	r" Wastes	
7/	8.	Has the generator attempted to locate and recovery facilities that provide tr greatest environmental benefit [268.8(2)]	eatment that yield	treatment ds the
	ъ.	Has the generator submitted to the Redemonstration and certification contaits document its efforts to locate pract	gional Adminstra	tion a ig information
	•	A list of facilities and facility officials contacted?	Yes	No
		Addresses	Yes	No
		Telephone Numbers	Yes	монический No
		Contact dates	Yes	No
		Attach a copy of the demonstrat	ion and certificat	ion
	. с.	treatment for its wastes, has it sent ded demonstrating why it was not able to for the waste?	ocumentation to E obtain treatment	PA
		Yes		
		If yes, attach a copy of written discus	331Uft.	

-		•			•	
	•					
			•	-		
				•		
				*		
•	*					
		•				

	c.	Did the to the r	generator ser ecciving facil	id a copy of ity with the Yes	f its demonst	t facilities	School de contraction
		Did the to the r	generator ser ecciving facil	id a copy of ity with the Yes	f its demonst e first shipm	tration and cer	School de contraction
		to the r	eceiving facil	ity with the	e first shipm		tification
		to the r	eceiving facil	ity with the	e first shipm		tification
	<b>.</b>		e generator p		No		
	<b>f.</b>						
			it of wastes?	ovide certi	fication with	h each subsequ	ent
	-			Yes	No		
	8.		e generator p ng facility wit			tification to th	ie .
		(i)	EPA Haza	rdous waste	e number	Yes	No
		(ii)	Manifest 1	umber		Yes	No
		(iii)	Waste ana			Yes .	No
	h.		e generator reations for a p			es, demonstrati	ions, and
				_ Yes	No		
(i.	.e., boile	ers, furna	RCRA 264/26 aces, distillation elementary no	on units, wa	astewater	<u>esses</u>	
	Are und	treatmei er RCRA	264/265?	enerated fro		processes exem	pt
	If y	es, list ty	ypes of waste			ocesses:	

# RCRA LAND DISPOSAL RESTRICTION INSPECTION TRANSPORTER CHECKLIST

# TRANSPORTER REQUIREMENTS

A.	Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?
	Yes No
	If yes, check the appropriate regulatory status:  Interim status for storage  RCRA permit for storage
	If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:
В.	Does the transporter mix, combine, or recontainerize wastes?
	Yes No
C.	Is the waste treated in an exempt treatment process on-site?
	Yes No

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

### TSD CHECKLIST

# TSD REQUIREMENTS

A.

Gen	eral	Facility Standard	<u> </u>			
1.		oes the waste anal quirements [264.13		Part 268		
	0	F-solvent	Yes	No	NA	
	0	California List	Yes	No	NA	
	0	First Third	Yes	No	NA	
2.		oes the facility ob astes and residues		tive chemical as	nd physical analyses of	ſ
			Yes	No	·	
	2.	What date was	the waste ana	lysis plan last re	vised?	
	ъ.	Are analyses c	onducted on-si	te or off-site?		
			•	On-site	e Off-site	
		Identify off-si	te lab:			
	c.	Is F-solvent w	aste analyzed t	using TCLP?		
			Yes	No	NA	
	d.	appropriate fo	or the objective	of the specified uction technological of the specific of the s	lytical method that is ed BDAT (i.e., total ogies and TCLP for	
			Yes	No	NA	
		con	stituent) for fi		ds (TCLP or total with specified treatm D.	ent
	€.	Describe the f	requency of sa	mpling:		
				WOOD COMMITTEE OF THE PROPERTY		

	3.	Are the operating records, including analyses and quantities, complete [264.73/265.73]?
		Yes No
В.	Sto	rage (268.50)
	1.	Are restricted wastes stored on-site?
		Yes No
		If no, go to C, Treatment.
	2.	If yes, check the appropriate method.
		Tanks Containers
	3.	Are all containers clearly marked to identify the contents and date(s) entering storage?
-		Yes No NA
	4.	Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?
		Yes No
	5.	Do operating records agree with container labeling?
		Yes No NA
	6.	Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?
		Yes No

7.	Have wastes been stored for more than I year since the applicable LDR regulations went into effect?				
	Yes No NA				
	If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?  Yes No				
	If yes, state how:				
8.	Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?				
	Yes No NA				
	If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?				
	Yes No				
9.	Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating				
	record? Yes No NA				
•					
Tre	<u>atment</u>				
I.	Does the facility treat restricted wastes other than in surface impoundments?  Yes No				
•	If no, go to D, Treatment in Surface Impoundments.				

C.

nalysis plan, determine whether the residue or residue extract or treatment standards expressed as concentrations in the aste extract) from all treatment processes is less than reatment standards [268.7(b)]?	Does the facility, in accordance with an acceptable waste
aste extract) from all treatment processes is less than eatment standards [268.7(b)]? YesNo  dilution used as a substitute for treatment?YesNo  re notifications, demonstration, and certification (if opplicable) prepared by the generators kept in the facility's perating record? YesNo  oees the facility ship any waste or treatment residue that meets the eatment standards to an off-site disposal facility? YesNoNA  Yes, does the treatment facility provide notification and extification to the disposal facility? YesNo  YesNo  YesNo  Yes, does notification contain the following?  EPA Hazardous waste number(s)Yes  Applicable treatment standardsYes  Manifest numberYes	
YesNo YesNoNA YesNoNA YesNoNA YesNoNA YesNoNA YesNoNA YesNo	waste extract) from all treatment processes is less than
Yes No  re notifications, demonstration, and certification (if opplicable) prepared by the generators kept in the facility's perating record?  Yes No  reset the facility ship any waste or treatment residue that meets the eatment standards to an off-site disposal facility?  Yes No NA  Yes, does the treatment facility provide notification and extification to the disposal facility?  Yes No  Yes, does notification contain the following?  EPA Hazardous waste number(s) Yes Applicable treatment standards Yes Manifest number Yes Yes	treatment standards [268.7(b)]?
Yes No  The notifications, demonstration, and certification (if opplicable) prepared by the generators kept in the facility's perating record?  Yes No  The notifications, demonstration, and certification (if opplicable) prepared by the generators kept in the facility's perating record?  Yes No  Yes No  Yes No NA  Yes, does the facility provide notification and certification to the disposal facility?  Yes No  Yes No  Yes, does notification contain the following?  EPA Hazardous waste number(s) Yes Applicable treatment standards Yes Manifest number Yes Manifest number Yes Manifest number Yes Manifest number	Yes No
re notifications, demonstration, and certification (if opplicable) prepared by the generators kept in the facility's perating record? YesNo YesNo YesNoNA  Tyes, does the treatment facility provide notification and extification to the disposal facility? YesNo  Tyes, does notification contain the following?  EPA Hazardous waste number(s)Yes  Applicable treatment standardsYes  Manifest numberYes	Is dilution used as a substitute for treatment?
yes No  yes No  oes the facility ship any waste or treatment residue that meets the eatment standards to an off-site disposal facility?  Yes No NA  yes, does the treatment facility provide notification and extification to the disposal facility?  Yes No  yes, does notification contain the following?  EPA Hazardous waste number(s) Yes Applicable treatment standards Yes Manifest number Yes Yes	Yes No
yes No  yes No  oes the facility ship any waste or treatment residue that meets the eatment standards to an off-site disposal facility?  Yes No NA  yes, does the treatment facility provide notification and extification to the disposal facility?  Yes No  yes, does notification contain the following?  EPA Hazardous waste number(s) Yes Applicable treatment standards Yes Manifest number Yes Yes	
roes the facility ship any waste or treatment residue that meets the eatment standards to an off-site disposal facility? YesNoNA  Tyes, does the treatment facility provide notification and extification to the disposal facility? YesNo  Tyes, does notification contain the following?  EPA Hazardous waste number(s)Yes  Applicable treatment standardsYes  Manifest numberYes	are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?
Yes No NA  Yes, does the treatment facility provide notification and extification to the disposal facility?  Yes No  Yes No  Yes, does notification contain the following?  EPA Hazardous waste number(s) Yes  Applicable treatment standards Yes  Manifest number Yes	Yes No
yes, does the treatment facility provide notification and extification to the disposal facility?  Yes No  yes, does notification contain the following?  EPA Hazardous waste number(s) Yes  Applicable treatment standards Yes  Manifest number Yes	Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?
Yes No  Yes, does notification contain the following?  EPA Hazardous waste number(s) Yes  Applicable treatment standards Yes  Manifest number Yes	Yes No NA
yes, does notification contain the following?  EPA Hazardous waste number(s) Yes  Applicable treatment standards Yes  Manifest number Yes	If yes, does the treatment facility provide notification and certification to the disposal facility?
EPA Hazardous waste number(s) Yes  Applicable treatment standards Yes  Manifest number Yes	Yes No
Applicable treatment standards Yes  Manifest number Yes	If yes, does notification contain the following?
Manifest number Yes	EPA Hazardous waste number(s) Yes
Manifest number Yes	Applicable treatment standards Yes ]
watte analytic data it available Vee	Waste analysis data, if available Yes 1
music analysis data, if available	
	EPA Hazardous waste number(s) Yes  Applicable treatment standards Yes  Manifest number Yes

	8.	Does the facility ship any "soft hammer" waste to an off-site disposal facility?
		Yes No NA
		If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?
		Yes No
D.	Tre	atment in Surface Impoundments
	Î.	Are restricted wastes placed in surface impoundments for treatment?
		Yes No
		If no, go to E, Land Disposal.
	2.	If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?
		Yes No
	3.	If the minimum technology requirements have not been met, has a waiver been granted for that unit?
*. ***		Yes No NA
	4.	Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?
		Yes No
		Attach test results.
۰	5.	Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?
		Yés No

Doc of	es the operating record adequately document the results waste analyses performed in accordance with 268.41?	
	Yes No	
	the hazardous waste residues exceed the treatment adards (268.41) or do not meet the prohibition levels?	
	Sludge Yes No	
	Supernatant Yes No	
a.	If yes, are sludge and supernatant removed adequately on an an basis?	nua
	Yes No	
ъ.	Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?	
	Yes No	
c.	Are residues subsequently managed in another surface impoundment?	
	Yes No	
đ.	Are residues treated prior to disposal?	
	Yes No	
	If yes, are waste residues treated on-site or off-site?	
	On-site Off-site	

	landfills	surface impour	ndments, wa	disposal units such a ste piles, wells, land o or concrete vault or	reatment
		<u>monominals</u>	Yes	No	
	Note:	Do not includin Surface Im		poundments addresse	ed in D, Treatm
	If yes, spreceived			wastes each unit has	3
	laterally minimur	expanded lands	fill or impou quirements (	w, replacement, or indment that meets the double liner and leaching?	
٠		•	Yes	No	· · · · · · · · · · · · · · · · · · ·
	demonst	facility operat	ing record h	No ave notices, certificate tenerators/storer/trea	tions, and
•	demonst	facility operation (if application (if application), 268.7(a), (b)]?	ing record h	ave notices, certifica cenerators/storer/trea	tions, and
	demonst [268.7(c)] Does the to the w	facility operativation (if application (if application (268.7(a),(b)]?	ing record h cable) from g Yes waste analy an) to determ	ave notices, certificate cenerators/storer/trea  No  sis data or test the wastes of	tions, and ters for 5 years astes (according
	demonst [268.7(c)] Does the to the w	facility operation (if application (if applica	ing record h cable) from g Yes waste analy an) to determ	ave notices, certificate cenerators/storer/trea  No  sis data or test the wastes of 7(c)]?	tions, and ters for 5 years astes (according

E.

б.

\_\_\_\_No \_\_\_\_Yes

Does the facility dispose of restricted wastes that are subject to a national capacity variance?

1.	Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?						
	Yes	No	NA				
8.	What is the volume of the restricted wa	What is the volume of the restricted wastes disposed of to date?					
9.	If the facility has a case-by-case extenmaking progress as described in progre	sion, is the fa ss reports?	cility				
	Yes	No	NA				

## APPENDIX A

# SOLVENT IDENTIFICATION CHECKLIST

\$ERA &	Does the handler generate any of the following constituents (i.e., spent halogenated solve degreasing) as a result of being used in in pure form or commercial grade?	ents used in				
	tetrachloroethylene	Yes	No			
	trichloroethylene	Yes				
	methylene chloride	Yes	No			
	1,1,1-trichloroethane	Yes	No			
	carbon tetrachloride	Yes	No			
	chlorinated fluorocarbons	Yes	No			
2.	Does the handler generate any of the fo constituents (i.e., spent halogenated solve being used in the process either in pure commercial grade?	ents) as a res				
	tetrachloroethylene	Yes	No			
	trichloroethylene	Yes				
	methylene chloride	Yes	No			
	1,1,1-trichloroethane	Yes Yes	No			
	chlorobenzene	Yes	No			
	trichlorofluoromethane	Yes				
	1,1,2-trichloro-1,2,2-trifluoroethane	Yes				
	ortho-dichlorobenzene	Yes	No			
3.	Does the handler generate any of the following F003 constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?					
	xylene	Yes	No			
	acetone	Yes				
	ethyl acetate	Yes				
	ethyl benzene	Yes				
	ethyl ether	Yes	-			
	methyl isobutyl ketone	Yes	No			
	n-butyl alcohol	Yes				
	cyclohexanone	Yes				
	methanol	Yes	No			
	If the F003 waste stream has been mixe does the resultant mixture exhibit the is characteristic?	d with a soli gnitability Yes	•			

4.	constituents (i.e., spent nonhalogenated solvents) as a result of being used in the process either in pure form or commercial grade?					
	cresols and cresylic acid nitrobenzene	YesNo YesNo				
5.	Does the handler generate any constituents (i.e., spent nonhalog result of being used in the proceeding commercial grade?	genated solvents) as a				
	toluene methyl ethyl ketone carbon disulfide isobutanol pyridine	YesNoYesNoYesNoYesNoYesNo				
6.	Are any of the constituents listed in questions 1 through 5 used for their "solvent" properties that is to solubilize (dissolve) or mobilize other constituents? The following questions will be helpful in confirming this determination.					
	(a) Are the constituents used	as chemical carriers?YesNo				
	If yes, list the constituents.					
	(b) Are the constituents used	for degreasing/cleaning?YesNo				
	If yes, list the constituents.					
	(c) Are the constituents used a	as diluents?YesNo				
	If yes, list the constituents.					
	(d) Are the constituents used a	as extractants?YesNo				

(c) Ar	e the constituents used for fabric scouring?YesNo
If yes, I	ist the constituents.
(f) As	e the constituents used as reaction and synthesis mediaYesNo
If yes, i	ist the constituents.
eve that i	ses to questions 1 through 6 led the inspector to the waste may be an F-solvent, answer question 7.  of the above constituents spent solvents? (A solvent
usable reproce	vaste is a mixture of constituents as determined in
usable reproce  If the vectors	without being regenerated, reclaimed, or otherwise ssed.)  YesNo
If the vocation constitution of the vocation constitution	without being regenerated, reclaimed, or otherwise seed.)  YesNo  waste is a mixture of constituents as determined in as 1 through 6, give the concentration before use of all tents in the solvent mixture/blend. For example:  methylene chloride trichloroethylene 1,1,1-trichloroethane
usable reproce  If the vocation constitution of the vocation constitution constitut	without being regenerated, reclaimed, or otherwise seed.)  YesNo  waste is a mixture of constituents as determined in as I through 6, give the concentration before use of all tents in the solvent mixture/blend. For example:  methylene chloride trichloroethylene 1,1,1-trichloroethane mineral spirits  waste stream is a mixture containing a total of 10% as (by volume) of one or more of the F001, F002, F004,

If the waste stream is a mixture containing F003 constituents and a total of 10% or more of one or more of the F001, F002, F004, and F005 listed constituents before use, it is a listed waste. For example:

50%	xylene	(F003)
12%	. •	(F001)
38%	mineral	•
100%		•

If in light of the above, the handler appears to be generating F001 - F005 hazardous wastes, refer this facility to the enforcement official for followup actions verifying the use of solvents at the facility.

# APPENDIX B TREATMENT STANDARDS FOR F-SOLVENTS

	CONCENTRATION (IN MG/L)			
F001-F005 SPENT SOLVENTS	WASTEWATERS	OTHER WASTES		
Acetone	0.05	0.59		
N-butyl	5.0	5.0		
Carbon disulfide	1.05	4.81		
Carbon tetrachloride	.05	.96		
Chlorobenzene	.15	.05		
Cresols (and cresylic acid)	2.82	.75		
Cycohexanone	.125	.75		
1,2-dichlorobenzene	.65	.125		
Ethyl acetate	.05	.75		
Ethyl benzene	.05	.053		
Ethyl ether	.05	.75		
Isobutanol	5.0	5.0		
Methanol	.25	.75		
Methylene chloride	.20	.96		
Methylene chloride (from the pharmac	ceutical			
industry)	0.44	.96		
Methyl ethyl ketone	0.05	0.75		
Methyl isobutyl ketone	0.05	.33		
Nitrobenzene	0.66	0.125		
Pyridine	1.12	0.33		
Tetrachloroethylene	0.079	0.05		
Toluene	1.12	0.33		
1,1,1-Trichloroethane	1.05	0.41		
1,2,2-Trichlor 1,2,2-trifluoroethane	1.05	0.96		
Trichloroethylene	0.062	0.091		
Trichlorofluoromethane	0.05	0.96		
Xylene	0.05	0.15		

### APPENDIX C

# DETAILED DESCRIPTION OF FIRST THIRD WASTE CODES

#### 261.31 Wastes

F006—Wastewater treatment sludges from electroplating operations except from the following processes: (1) Sulfuric acid anodizing of aluminum; (2) tin plating on carbon steel; (3) zinc plating (segregated basis) on carbon steel; (4) aluminum or zinc-aluminum plating on carbon steel; (5) cleaning/stripping associated with tin, zinc and aluminum plating on carbon steel; and (6) chemical etching and milling of aluminum.

F007—Spent cyanide plating bath solutions from electroplating operations.

P008—Plating bath sludges from the bottom of plating baths from electroplating operations where cyanides are used in the process.

F009—Spent stripping and cleaning bath solutions from electroplating operations where cyanides are used in the process.

F019—Wastewater treatment sludges from the chemical conversion coating of aluminum.

#### § 261.32 Wastes

- K001—Bottom sediment sludge from the treatment of wastewaters from wood preserving processes that use creosote and/or pentachlorophenol.
- K004—Wastewater treatment sludge from the production of zinc yellow pigments.
- K008—Over residue from the production of chrome oxide green pigments.
- K011—Bottom stream from the wastewater stripper in the production of acrylonitrile.
- K013—Bottom stream from the acetonitrile column in the production of acrylonitrile.
- K014—Bottoms from the acetonitrile purification column in the production of acrylonitrile.
- K015—Still bottoms from the distillation of benzyl chloride.
- K016—Heavy ends or distillation residues from the production of carbon tetrachloride.
- K017—Heavy ends (still bottoms) from the purification column in the production of epichlorohydrin.
- K018—Heavy ends from the fractionation column in ethyl chloride production.
- K019—Heavy ends from the distillation of ethylene dichloride in ethylene dichloride production.
- K020—Heavy ends from the distillation of vinyl chloride in vinyl chloride monomer production.
- K021—Aqueous spent antimony catalyst waste from fluoromethanes production.
- K622—Distillation bottom tars from the production of phenol/acetone from cumane.
- K024—Distillation bottoms from the production of phthalic anhydride from naphthalene.
- K025—Distillation bottoms from the production of nitrobenzene by the nitration of benzene.

- K030—Column bottom or heavy ends from the combined production of trichloroethylene and perchloroethylene.
- K031-By-products salts generated in the production of MSMA and cacodylic acid.
- K035—Wastewater treatment sludges generated in the production of creosote.

  K036—Still bottoms from toluene reciama.
- K036—Still bottoms from toluene reclamation distillation in the production of disulfoton.
- K037—Wastewater treatment sludge from the production of disulfoton.
- K044—Wastewater treatment sludges from the manufacturing and processing of explosives.
- K045—Spent carbon from the treatment of wastewater containing explosives.
- K045—Wastewater treatment sludges from the manufacturing, formulation and loading of lead-based initiating compounds.
- K047-Pink/red water from TNT operations.
- K048—Dissolved air flotation (DAF) float from the petroleum refining industry.
- K049—Stop oil emulsion solids from the petroleum refining industry.
- K050—Heat exchange bundle cleaning sludge from the petroleum refining industry.
- K051—API separator sludge from the petroleum refining industry.
- K052—Tank bottoms (leaded) from the petroleum refining industry.
- K060—Ammonia still lime sludge from coking operations.
- K061—Emission control dust/sludge from the primary production of steel in electric furnaces.
- K062—Spent pickle liquor from steel finishing operations in chlorine production.
- K069—Emission control dust/sludge from secondary lead smelting.
- K071—Brine purification muds from the mercury cells process in chlorine production, where separately prepurified brine is not used.
- K073—Chlorinated hydrocarbon waste from the purification step of the diaphragm cell process using graphite anodes
- K083—Distillation bottoms from aniline production.
- K084—Wastewater treatment sludges generated during the production of veterinary pharmaceuticals from arsenic or organoarsenic compounds.
- K085—Distillation of fractionation column bottoms from the production of chlorobenzenes.
- K086—Solvent washes and sludges; caustic washes and sludges, or water washes and sludges from cleaning tubs and equipment used in the formulation of ink from pigments, driers, soaps, and stabilizers containing chromium and lead.
- K087-Decanter tank tar sludge from coking operations.
- K099-Untreated wastewater from the production of 2,4-D.

#### \$ 261.33(f) Wastes

K100-Waste leaching solution from acid U007-Acrylamide leaching of emission control dust/sludge U009-Acrylonitrile from secondary lead smelting. U010-Mitomycin C K101-Distillation tar residues from the dis-U012—Aniline U016—Benz(c)acridine tillation of aniline-based compounds in the production of veterinary pharmaceuti-U018-Benz(a)anthracene cals from arsenic or organo-arsenic com-U019-Benzene pounds. U022-Benzo(a)pyrene K102-Residue from the use of activated U029—Methyl bromide U031—n-Butanol U036—Chlordane, technical carbon for decolorization in the production of veterinary pharmaceuticals from U037-Chlorobenzene arsenic or organo-arsenic compounds. K103—Process residues from aniline extrac-U041—n-Chloro-2,3-epoxypropane U043—Vinyl chloride U044—Chloroform tion from the production of aniline. K104—Combined wastewater streams gener-U046—Chloromethyl methyl ether U050—Chrysene ated from nitrobenzene/aniline production. K106-Waste water treatment sludge from U051—Creosote U053—Crotonaldehyde U061—DDT the mercury cell process in chlorine production. U063—Dibenz o (a, h) anthracene § 261.33(e) Wastes U064-1,2:7,8 Dibenzopyrene P001-Warfarin, when present at concentra-U066-Dibromo-3-chloropropane 1,2tion greater than 0.3% U067-Ethylene dibromide P004—Aldrin P005—Allyl alcohol U074-1,4-Dichloro-2-butene U077-Ethane, 1,2-dichloro-P010-Arsenic acid U078-Dichloroethylene, 1,1-P011-Arsenic (V) oxide U086-N.N Diethylhydrazine P012-Arsenic (III) oxide U089—Diethylstilbestrol P015-Beryllium dust U103-Dimethyl sulfate P016-Bis-(chloromethyl) ether U105-2.4-Dinitrotoluene P018-Brucine U108-Dioxane, 1,4-P020—Dinoseb U115-Ethylene oxide P030-Soluble cyanide salts not elsewhere U122-Formaldehyde specified U124—Furan U129—Lindane P036-Dichlorophenylarsine P037-Dieldrin U130-Hexachlorocyclopentadiene P039-Disulfoton U133-Hydrazine P041-Diethyl-p-nitrophenyl phosphate U134—Hydrofluoric acid U137—Indeno(1,2,3-cd)pyrene P048-2.4-Dinitrophenol P050-Endosulfan U151-Mecury P058-Fluoracetic acid, sodium salt U154-Methanol P059—Heptachlor U155-Methapyrilene U157-3-Methylcholanthrene P063-Hydrogen cyanide P068-Methyl Hydrazine U158-4.4-Methylene-bis-(2-chloroaniline) P069-Methyllactonitrile U159-Methyl ethyl ketone P070-Aldicarb U171-Nitropropane, 2-U177-N-Nitroso-N-methylurea P071-Methyl parathion P081-Nitroglycerine U180—N-Nitrosopyrrolidine U185—Pentachloronitrobenzene P082-N-Nitrosodimethylamine P084—N-Nitrosomethylvinylamine P087—Osmium tetraoxide U188-Phenol U192-Pronamide P089-Parathion U200—Reserpine U209—Tetrachloroethane, 1,1,2,2-P092-Phenylmercuric acetate P094-Phorate P097-Famphur U210-Tetrachloroethylene P102-Propargyl alcohol U211-Carbon tetrachioride U219-Thiourea P105-Sodium szide U220-Toluene P108-Strychnine and salts P110-Tetraethyl lead U221-Toluenediamine U223-Toluene diisocyanate P115-Thallium (1) sulfate P120-Vanadium pentoxide U226-Methylchloroform U227-Trichloroethane, 1.1,2-P122-Zinc phosphide, when present at con-U228-Trichloroethylene centrations greater than 10%

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P123-Toxaphene

U237-Uracil mustard

U238-Ethyl carbamate

tions of 0.3% or less

centrations of 10% or less

U248-Warfarin, when present at concentra-

U249-Zinc phosphide, when present at con-

# APPENDIX D TREATMENT STANDARDS

Waste Type:	Pharmaceuticals Industry Sul Revision	category wastewater	Norwastewaters —		Vesteweters		
Waste No.	BOAT	Constituents	Total Composition	TCLP	Total Com	position /l)	TCLP
F001 - F005	Westewaters: Steam stripping process	Methylene Chioride			0.4	4	
laste Type:	Wastewater Treatment Sludges See Regulations for exception	from Electroplating.	Honwastewat	ers		Vastewaters	
Veste No.	BOAT	Constituents	Total Composition (mg/k)	TCLP (mg/l)	Total Com (mg,		TCLP
F006	Monwastewaters: Stabilization process using cement kiln dust as a binding agent.	Cadmium Chromium (total) Lead Nickel Silver		0.066 5.2 0.51 0.32 0.72			
	Wastewaters: Soft Hammer	Cyanides	Reserved	Reserved			
Waste Type:	Bottom Sediment Sludge from the Treatment of Wastewaters from Wood Preserving Processes that Use Creosote and/or Pentachlorophenol.		Nonwastewaters		Westewaters		
laste No.	BOAT	Constituents	Total Composition	TCLP (mg/kg)	Total Comp (mg/		TCLP
K001	Nonwastewaters and Vastewaters: Organic Constituents - rotary kiln incinerator	Kapthalene Pentachlorophenol Phenanthrene Pyrene Toluene	8.0 37.0 8.0 7.3 0.14		0.1 0.8 0.1	98 15 14	
	Nonwastewaters: Metal Constituents - stabilization process	Xylenes Lead	0.16	0.51	0.1 0.1 0.0	16	
	Wastewaters: Metal Constituents - chemical precipitation						

Waste Type:	Still Bottoms from the Dist Chloride	,	Norwastew	aters	Vastevaters	
Waste No.	BDAT	Constituents	Total Composition	TCLP	Total Composition (mg/l)	TCLP
ко15	Norwastewaters: Liquid Injection Incinerator (based on premise of "no ash")  Wastewaters: Organic Constituents- liquid injection incineration Metal Constituents - chemical precipitation	Anthracene Benzal Chloride Benzo (b and/or k) Fluoranthene Phenanthrene Toluene Chromium (total) Nickel	No land disposal	No land disposal	1.0 0.28 0.29 0.27 0.15 0.32 0.44	

Waste Type: Production of Chlorinated Chemicals in the Organic Chemical Industry: heavy ends or distillation residues from the production of carbon tetrachloride (KO16); heavy ends from the fractionation column in ethyl chloride production (K018); heavy ends from the distillation of ethylene dichloride in ethylene dichloride production (K019); heavy ends from the distillation of vinyl chloride in vinyl chloride monomer production (KO2O); column bottoms or heavy ends from the combined production of trichloroethylene and perchioroethylene (K030)

Norwastewaters

**Hastewaters** 

Weste No.	BDAT	Constituents	Total Composition (mg/kg)	TCLP	Total Composition (mg/l)	TCLP
K016	Norwestewaters and	Hexach lorobenzene	28		0.033	
2010	Wastewaters:	Hexachlorobutadiene	5.6		0.007	
	Organic Constituents -	Hexachiorocyclopentadiene	5.6		0.007	
	rotary kiln incineration	Hexachloroethane	28		0.033	
	i oco, y ki tiv i i ovi u ovi	Tetrachloroethene	6.0		0.007	
W048		Chloroethane	6.0		0.007	
K018		Chloromethane	<b>9.0</b>		0.007	
		1,1-Dichloroethane	6.0		0.007	
		1.2-Dichloroethane	6.0		0.007	
		Hexach lorobenzene	28		0.033	
		Nexaction obertene	5.6		0.007	
		Hexachi oroethane	28			
		Pentachloroethane	5.6		0.007	
		1,1,1-Trichloroethane	6.0		0.007	
		• •			•	

Waste No.	BDAT	Constituents	Total Composition (mg/kg)	TCLP	Total	Composition (mg/l)	TCLP
K019	•	Bis(2-Chloroethyl)ether	5.6			0.007	
		Chlorobenzene	6.0			0.006	
		Chloroform	6.0			0.007	
		p-Dichlorobenzene				0.008	
		1,2-Dichloroethane	6.0			0.007	
		Fluorene			,	0.007	
		Hexachloroethane	2.8			0.033	
		Naphthalene	5.6			0.007	
		Phenanthrene	5.6			0.007	
		1,2,4,5-Tetrachlorobenzene				0.017	
		Tetrachloroethene	6.0			0.007	
		1,2,4-Trichlorobenzene	19.0			0.023	
		1,1,1-Trichloroethane	6.0			0.007	
K020		1,2-Dichloroethane	6,0			0.007	
		1,1,2,2-Tetrachloroethane	5.6			0.007	
		Tetrachloroethene	6.0		4	0.007	
K030		O-Dichlorobenzene				0.008	
		p-Dichtorobenzene				0.008	
		Hexach Lorobutadiene	5.6			0.007	
	•	Hexachloroethane	28			0.033	
		Hexach ( oropropene	19			VII.000	
		Pentach Lorobenzene	28				
		Pentachloroethane	5.6			0.007	
		1,2,4,5-Tetrachlorobenzene	14			0.017	
		Tetrachloroethene	6.0			0.007	
		1,2,4-Trichlorobenzene	19			0.023	
ste Type:	Distillation Bottom Tars fro Phenol/Acetone from Cumene	m the Production of	, Nonwastewate	rs		Wastewaters	
ste No.	BDAT	Constituents					
	WA1	Constituents	Total Composition (mg/k)	TCLP (mg/l)	Total (	Composition	TCLP
KOSS	Monwastewaters: Organic Constituents -	Acetophenone	19				
	fuel substitution unit	Sum of Diphenylamine	4-			4	
	Metal Constitution unit	and Diphenyinitrosamine Phenol	13				
	stabilization treatment	rnenol Toluene	12				
	process	Chromium (total)	0.034				
	L. 2002	Nickel		5.2 0.32			

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Waste Type:	Distillation Bottom Tars from the Production of Phthalic Anhydride from Naphthalene		Нопнав t ена t	Horwastewaters		Wastewaters		
Waste No.	BDAT	Constituents	Total Composition (mg/kg)	TCLP	Total	Composition (mg/l)	TCLP	
K0Z4	Monwestewaters and Wastewaters: Rotary Kiln Incineration	Phthalic Acid	28	MANAGEMENT CONTROL OF THE STATE	anne a sa s	0.54	MIDE AND THE STATE OF THE STATE	
este Type:	: Wastewater Treatment Sludge from the Production of Disulfoton		Norwas t eva t	ers	getting for the state of the st	. Wastewaters	arto participation de la constanta de la const	
laste No.	BDAT	Constituents	Total Composition (mg/kg)	TCLP	Total	Composition (mg/l)	TCLP	
K037	Monwestewaters and Wastewaters: Rotary Kiln Incineration	Disulfoton Toluene	0.1 28			0.003 0.028		
aste Type:	Explosives Industry: Waste the Manufacturing and Proc Carbon from the Treatment of (KO45); Pink/Red Water from	essing of Explosives (KO44) of Wastewater Containing Ex	; Spent	ters	ocumentum (varyl-), - 1 - 4040 memon	Vastewatera	n de	
laste No.	80AT	Constituents	Total Composition	TCLP	Total	Composition	TCLP	
K044 K045 K047	Open detonation/ open burning/chemical deactivation		No land disposal based	on reactivity.	No len	d disposat based	on reactivit	

Waste Type:	Wastewater Treatment Sludges from the Manufacturing, Formulation, and Loading of Lead-Based Initiating Compounds		Norwastewaters		Vestevaters	
Waste No.	BDAT	Constituents	Total Composition	TCLP (mg/l)	Total Composition	TCLP
	Nonwestewaters (nonreactive subcategory): Stabilization Process	Lead	·	0.18		
laste Type:	- Meat Exchanger Bundle Clean	op Oil Emulaion Solida (KG49):	Nonwestewate	ers	Vastevater	*8
leste No.	BOAT	Constituents	Total Composition (mg/kg)	TCLP (mg/l)	Total Composition (mg/l)	TCLP
K048	Monwastewaters: Organic Constituents - solvent extraction and/or incineration Metal Constituents - stabilization process  Wastewaters: Organic Constituents - incineration  Metal Constituents - chromium reduction, lime and sulfide precipitation, and vacuum filtration	Benzene Benzo(a)pyrene Bis(2-ethylhexyl)phthalate Chrysene Di-n-butyl Phthalate Ethylbenzene Fluorene Maphthalene Phenanthrene Phenol  Pyrene Toluene Xylenes Cyanides (total) Arsenic Chromium (total) Nickel Selenium Lead	9.5 0.84 37 2.2 4.2 67 Reserved 7.7 2.7 2.0 9.5 Reserved 1.8	0.004 1.7 0.048 0.025	0.011 0.047 0.043 0.043 0.060 0.011 0.050 0.033 0.039 0.047 0.045 0.011 0.011	
K049		Anthracene Benzene Benzo(a)pyrene Bis(2-ethylhexyl)phthalate Carbon Disulfide Chrysene 2,4-Dimethylphenol Ethylbenzene	6.2 9.5 0.84 37 2.2		0.039 0.011 0.047 0.043 0.011 0.043 0.033	

K049	(Continued)				•
	,	<b>Maph the Lene</b>	Reserved		0.033
		Phenanthrene	7.7		0.039
		Phenol	2.7		0.047
		Pyrene	2.0		0.045
		Toluene	9.5		0.011
		Xylenes	Reserved		0.011
		Cyanides (total)	1.8		
	•	Arsenic		0.004	
		Chromium (total)		1.7	0.020
	•	Micket		0.048	
		Selenium		0.025	
		Lead			0.037
K050		Benzo(a)pyrene	0.084		0.047
		Phenol	2.7		0.047
		Cyanides (total)	1.8		
		Arsenic		0.004	
		Chromium (total)		1.7	0.20
		Nickel		0.048	
		Sel en i um		0.025	
		Lead			0.037
K051		Acenaphthene			0.050
		Anthracene	6.2		0.039
		Benzene	9.5		0.011
		Benzo(a)anthracena	1.4		0.043
		Benzo(a)pyrene	0.84		0.047
		Bis(2-ethylhexyl)phthalate	37		0.043
		Chrysene	2.2		0.043
		Di-n-butyl Phthalate	4.2		0.060
		Ethylbenzene	67		0.011
		Fluorene			0.050
		<b>Maphthalene</b>	Reserved		0.033
		Phenanthrene	7.7		0.039
		Phenol	2.7		0.047
		Pyrene	2.0		0.045
		Toluene	9.5		0.011
		Xylenes	Reserved		0.011
		Cyanides (total)	1.8		
		Arsenic		0.004	
		Chromium (total)		1.7	0.20
		Hickel		0.048	
		Selenium		0.025	
		<b>Lead</b>	1		0.037
K052		Benzene	9.5		0.011
		Benzo(a)pyrene	0.84		0.047
		o-Cresol	2.2		0.011
		p-Cresol	0.90		0.011
		2,4-Dimethylphenol			0.033
		Ethylbenzene	67		0.011
		Naphthalene	Reserved		0.033
		Phenanthrene	7.7		0.039
		Phenol	2.7		0.047
		Toluene	9.5		0.011
		Xylenes	Reserved		0.011
		·			

K062	Norwastewaters and Wastewaters: Chromium Reduction, Chemical Precipitation with Sulfide, Settling, Filtering and Dewatering of	Chromium (total) Lead Mickel	;	0.094 0.037	0.032 0.04 0.44	
Waste No.	BDAT	Constituents	Total Composition	TCLP (mg/l)	Total Composition (mg/l)	TCLP
Waste Type:	ste Type: Spent Pickle Liquor Generated by Steel Finishing Operations of Facilities Within the Iron and Steel Industries		, Norwestewat	RFS	Vesteueters	
K061	Norwastewaters: High Zinc (15% or greater) Subcategory - high temperature metals recovery unit (HTMR) Low Zinc (less than 15%) Subcategory - stabilization	Cadmium Chromium (total) Lead Nickel		0.14 5.2 0.24 0.32		
Waste No.	BOAT	Constituents	Total Composition	TCLP (mg/l)	Total Composition	TCLP
Waste Type:	Emission Control Dust/Sludge of Steel in Electric Furnece	e from Primery Production es	Norwastewat	ers	Wastewaters	
		Lead		0.025	0.037	
K052	(Continued)	Cymnides (total) Arsenic Chromium (total) Nickel Selenium	1.8	0.004 1.7 0.048	0.20	

	<u> </u>				and the second s	
Waste Type:	Emission Control Dust/Sludge Smelting	from Secondary Lead	Мопнавtенаt	Nonwastewaters		
Jaste No.	80AT	Constituents	Total Composition	TCLP	Total Composition	TCLP
K069	Monwastewaters in Non-Calcium Sulfate Subcategory: recycling		No land dispos besed on recyc			
laste Type:	Brine Purification Muds from the Mercury Cell Process in Chlorine Production, where Separately Prepurified Brine is Not Used		Normas temat	ers	lies teus ters	
laste No.	BOAT	Constituents	Total Composition	TCLP (mg/l)	Total Composition (mg/l)	TCLP
K071	Nonwastewaters: Solubilize mercury in sludge and convert to insoluble mercury sulfide sludge.	Hercury		0.025	0.030	
aste Type:	Distillation Bottoms from An	iline Production	Nonwastewat	ers	Vastewaters	To the second
este No.	BOAT	Constituents	Total Composition	TCLP	Total Composition	TCLP
K083	Normastewaters and Wastewaters: No Ash Subcategory - Liquid injection incinerat	or	No Land dispose based on no ast		y paramental high dig the process of the second	<u> </u>

Waste Type: Solvent Washes and Sludges, Caustic Washes and Studges, or Waterwashes and Studges From the

Cleaning of Tubs and Equipment Used in the Formulation of Ink Pigments, Driers, Soaps, and Stabilizers Containing Chromium and Lead

#### Monwestewaters

Mestevaters

	Containing Circuital and Lead		Monmestewaters		Wastewaters		
Waste No.	8DAT .	Constituents	Total Composition (mg/kg)	TCLP (mg/l)	Total Composition (mg/l)	TCLP	
K086	Norwesteweters and	Acetone	0.37		0.015		
	Wastewaters,	Bis(2-ethylhexyl)phthalate	0.49		0.044		
	Solvent Washes	n-Butyl Alcohol	0.37		0.031		
	Subcategory:	Cyclohexanone	0.49		0.022		
	Organic Constituents -	1,2-Dichlorobenzene	0.49		0.044		
	incineration	Ethyl Acetate	0.37		0.031		
	Metal Constituents -	Ethyl Benzene	0.031		0.015		
	hexavalent chromium reduction, chemical	Methanol Mathematic	0.37		0.031		
	precipitation with	Methylene Chloride	0.037		0.031		
	excess lime, filtration	Methyl Ethyl Ketone	0.37		0.031		
	excess time, ittliation	Methyl Isobutyl Ketone Naphthalene	0.37		0.031		
		Nitrobenzene	0.49 0.49		0.044		
		Toluene	0.031	•	0.044 0.029		
		1,1,1-Trichloroethane	0.044		0.029		
		Trichloroethylene	0.031		0.029		
		Xylenes	0.015		0.015		
			~~~,>				
		Chromium (total)		0.094	0.32		
		Chromium (total) Lead		0.094 0.37	0.32 0.037		
faste Type:	Decanter Tank Tar Sludge fro	Lead	Norwastewat	0.37			
laste Type:	Decanter Tank Tar Sludge fro	Lead	Nonwestewate Total Composition (mg/kg)	0.37	0.037	TCLP	
		M Coking Operations	Total Composition (mg/kg)	0.37 ers	0.037  Westewaters  Total Composition (mg/l)		
leste No.	BDAT  Norwastewaters and Wastewaters:	Constituents	Total Composition	0.37 ers	0.037  Westewaters  Total Composition (mg/l)  0.028		
este No.	BDAT  Norwastewaters and Wastewaters: Organic Constituents -	Constituents  Acenaphthalene	Total Composition (mg/kg)	0.37 ers	0.037  Westewaters  Total Composition (mg/l)		
este No.	Nonwestewaters and Wastewaters: Organic Constituents - incineration in	Constituents  Acenaphthalene Benzene Chrysene Fluoranthene	Total Composition (mg/kg) 3.4 0.071	0.37 ers	0.037  Westewaters  Total Composition (mg/l)  0.028 0.014		
ieste No.	Nonwestewaters and Wastewaters: Organic Constituents - incineration in rotary kiln	Constituents  Accemphthalene Benzene Chrysene Fluorenthene Indeno (1,2,3-cd) pyrene	Total Composition (mg/kg) 3.4 0.071 3.4	0.37 ers	0.037  Westewaters  Total Composition (mg/l)  0.028  0.014  0.028		
ieste No.	Norwastewaters and Wastewaters: Organic Constituents - incineration in rotary kiln Metal Constituents -	Acenaphthalene Benzene Chrysene Fluoranthene Indeno (1,2,3-cd) pyrene Naphthalene	Total Composition (mg/kg)  3.4 0.071 3.4 3.4 3.4 3.4	0.37 ers	0.037  Westewaters  Total Composition (mg/l)  0.028 0.014 0.028 0.028 0.028 0.028		
leste No.	Norwestewaters and Westewaters: Organic Constituents - incineration in rotary kiln Metal Constituents - hexavalent chromium	Acenaphthalene Benzene Churanthene Fluoranthene Indeno (1,2,3-cd) pyrene Naphthalene Phenanthrene	Total Composition (mg/kg)  3.4 0.071 3.4 3.4 3.4 3.4 3.4 3.4	0.37 ers	0.037  Vestewaters  Total Composition (mg/l)  0.028 0.014 0.028 0.028 0.028 0.028 0.028		
ieste No.	Norwastewaters and Wastewaters: Organic Constituents - incineration in rotary kiln Hetal Constituents - hexavalent chromium reduction, chemical	Constituents  Constituents  Acenaphthalene Benzene Chrysene Fluoranthene Indeno (1,2,3-cd) pyrene Maphthalene Phenanthrene Toluene	Total Composition (mg/kg)  3.4 0.071 3.4 3.4 3.4 3.4 3.4 0.65	0.37 ers	0.037  Vastemeters  Total Composition (mg/l)  0.028 0.014 0.028 0.028 0.028 0.028 0.028 0.028		
ieste No.	Norwestewaters and Westewaters: Organic Constituents - incineration in rotary kiln Metal Constituents - hexavalent chromium	Acenaphthalene Benzene Churanthene Fluoranthene Indeno (1,2,3-cd) pyrene Naphthalene Phenanthrene	Total Composition (mg/kg)  3.4 0.071 3.4 3.4 3.4 3.4 3.4 3.4	0.37 ers	0.037  Vestewaters  Total Composition (mg/l)  0.028 0.014 0.028 0.028 0.028 0.028 0.028		

Waste Type:	Untreated Wastewater from the Production of 2,4-Dichlorophenoxyacetic Acid (2,4,D)		Monwastewaters	Wastewaters
Waste Mo.	BOAT	Constituents	Total Composition TCLP (mg/kg)	Total Composition TCLP (mg/l)
K099	Nonwastewaters and	2,4-Dichlorophenoxyacetic		
	Wastewaters: Chemical oxidation	Acid Hexachlorodibanzo-p-	1.0	1.0
	using chlorine.	dioxins	0.001	0.001
		Hexachlorodibenzofurans Pentachlorodibenzo·p·	0.001	0.001
		dioxins	0.001	0.001
		Pentachlorodibenzofurans Tetrachlorodibenzo-p-	0.001	0.001
		dioxins	0.001	0.001
		Tetrachlorodibenzofurans	0.001	0.001

Waste Type: Production of Vetinary Pharmaceuticals from Arsenic or Organo Arsenic Compounds: Distillation Tar Residues from the Distillation of Aniline-Based Compounds (K101); Residue from the Use of Activated Carbon for Discolorization (K102)

			Norwas tewa ters		Hestmoters		
deste No.	BDAT	Constituents	Total Composition (mg/kg)	TCLP (mg/l)	Total Composition (mg/l)	TCLP	
K101	Nonwastewaters and Wastewaters: Low Arsenic (less than 1% total arsenic) Subcategory - incineration in rotary kiln	Ortho-Mitroaniline Cadmium Chromium (total) Lead Nickel	14	0.066 5.2 0.51 0.32	0.27 2.0 0.24 0.11 0.027		
K102	;	Ortho-Nitrophenol Cadmium Chromium (totai) Lead Nickel	13	0.066 5.2 0.51 0.32	0.028 2.0 0.24 0.11 0.027		

	Process Residues from Anili Combined Wastewater Streams Nitrobenzene/Aniline Produc	Generated from	Normestewaters		Vestenaters		
Jaste No.	BDAT	Constituents	Total Composition TCLP (mg/k)		Total Composition (mg/l)	TCLP	
K103	Nonwastewaters and	Aniline	5.6		4.5		
	Wastewaters:	Benzene	6.0		0.15		
	Organic Constituents -	2,4-Dinitrophenol	5.6		0.61		
	solvent extraction,	Nitrobenzene	5.6		0.073		
	steam stripping, activated carbon	Phenol	5.6		1.4		
K104	adsorption, and	Aniline	5.6		4.5		
	incineration	Benzene	6.0		0.15		
		2,4-Dinitrophenol	5.6		0.61		
		N i trobenzene	5.6		0.073		
		Phenol Cyanides (total)	5.6		1.4 2.7		
laste Type:	Wastewater Treatment Sludge of Zinc Yellow Pigments	from the Production	Norwastewate	rs	Vesteueters		
		from the Production  Constituents	Nonwestewate  Total Composition	TCLP	Westewaters Total Composition	TCLP	
laste Type:	of Zinc Yellow Pigments		- ':			TCLP	
/aste No.	BDAT  No land disposal based	Constituents	- ':	TCLP			
Veste No.	BDAT  No land disposal based on no generation.  Oven Residue from the Produ	Constituents	Total Composition	TCLP	Total Composition		

			i i i i i i i i i i i i i i i i i i i		· · · · · · · · · · · · · · · · · · ·	**************************************		
/aste Type:	Type: Aqueous Spent Antimony Catalyst Waste From Fluoromethanes Production		Norwestewaters		Vastevaters	Vastevaters		
Waste No.	BOAT	Constituents	Total Composition	TCLP	Total Composition	TCLP		
K021	No land disposal based on no generation.							
/aste Type:	e: Distillation Bottoms from the Production of Nitrobenzene by the Nitration of Benzene		Norwastewat	Norwastewaters		Vastevaters		
Jeste No.	80AT	Constituents	Total Composition	TCLP	Total Composition	TCLP		
K025	No land disposal based on no generation.			15332				
aste Type:	Still Bottoms from Toluene in the Production of Disul	Reclamation Distillation foton	Norwas t ewat o	ers	Westewaters	A A A A A A A A A A A A A A A A A A A		
leste No.	BDAT	Constituents	Total Composition	TCLP	Total Composition	TCLP		
K036	No land disposal based on no generation.							
aste Type:	Ammonia Still Lime Sludge from Coking Operations		Korwastevate	ers	Wastewsters			
aste No.	BOAT	Constituents	Total Composition	TCLP	Total Composition	TCLP		
KO60 No land disposal based on no generation.		A STATE OF THE STA	NATURAL DESCRIPTION OF THE PROPERTY OF THE PRO	<u> </u>	маничения в при в пр	rzaszon vardojo (li entre la circultura de caracteria de caracteria de caracteria de caracteria de caracteria d		

Waste Type:		ution from Acid Leaching of ust/Sludge from Secondary Lead	Nonwastewaters		Wasteweters		
	BOAT	Constituents	Total Composition	TCLP	Total Composition	TCLP	
K100	No tend disposat based on no generation.						

★

### **MEMO**

To: File

From: Kathleen Miller

Date: 9/23/10

RE: Fulton Industries, Inc. (EPA ID# OHD 094 810 736)

### **Summary of Phone Conversations:**

On September 14, 2010 I attempted to call the contact person, Bill Sonnenberg per RCRA Info and was informed that he was on vacation. On September 22<sup>nd</sup>, I received a call from Mr. Sonnenberg and he informed me that his facility underwent an inspection for violations in January of 2004 and in August of 2008. All violations for both inspections were abated by OEPA. Mr. Sonnenberg provided me with two letters that stated Fulton Industries adequately demonstrated abatement of the violations discovered during the two inspections.

\* According to the 1992 PAVSI report, there were 5 SWMUs and 3 of them contained recommendations. I don't have any documentation that shows the facility addressed these recommendations. However, the facility is working with OEPA on maintaining compliance and a clean operation but the state has not addressed corrective action obligations with the facility.

Do the PAVSI recommendations warrant RRB attention (CA070NO) or is further investigation necessary (CA070YE)?

### Updated contact info for this facility:

Fulton Industries, Inc. 135 E. Linfoot St. Wauseon, OH 43567-0377

Bill Sonnenberg, Environmental Manager Tel: 419-335-3015

bills@fultonindoh.com

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FW: Bill Sonnenberg to: KathleenA Miller 09/22/2010 11:06 AM Show Details

Dear Ms. Miller,

Per our phone conversation this morning, I am forwarding two letters from Ohio EPA agent Ms. Wendy Miller concerning inspections and follow up abatement for Fulton Industries, Inc.

I hope this is what you were referring to and answers your questions.

Sincerely,

Bill Sonnenberg Fulton Industries, Inc. 135 E. Linfoot Street Wauseon, Ohio 43567 Phone: 419-335-3015 Fax: 419-335-3215

e-mail: bills@fultonindoh.com

----Original Message----

From: Samantha Nation [mailto:snation@fultonindoh.com]

Sent: Wednesday, September 22, 2010 11:01 AM

To: bills@fultonindoh.com

Cc: bsonnenberg@fultonindoh.com

Subject:

Samantha Nation Fulton Industries, Inc 419-335-3015

fax: 419-335-3215

email: snation@fultonindoh.com

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State of Ohio Environmental Protection Agency

#### Northwest District Office

347 North Dunbridge Road Bowling Green, OH 43402-9398 TELE: (419) 352-8461 FAX: (419) 352-8468

Bob Talt, Governor Christopher Jones, Director

Re:

Fulton Industries OHD094810736 **DHWMRTO Fulton County** 

November 3, 2004

Mr. Bill Johnson Fulton Industries 135 East Linfoot Street Wauseon, Ohio 43567

Dear Mr. Johnson:

Thank you for your responses to Ohio EPA's January 27, 2004, Notice of Violation letter. I have briefly outlined below each violation and what Fulton Industries completed in order to abate each violation. I have also included the dates that I received any documentation.

#### 1) OAC Rule 3745-52-11, Waste Evaluation:

Fulton Industries failed to properly evaluate the following wastes:

- a) Sand from the filter located in a drum near the Baker Plating Line On April 26, 2004, Fulton Industries sent me analytical results which showed the waste sand to be non-hazardous.
- b) Residues from the Old Barrel Line Fulton Industries had composite samples taken of material on the floor in February 2004. I received the results on September 7, 2004. Results show the material is non-hazardous.
- c) Waste Water awaiting disposal to city On January 26, 2004. Fulton Industries sent me a copy of the analytical that was run on the samples taken of this wastewater prior to its discharge. The wastewater was not a hazardous waste and was discharged to the City of Wauseon.

#### This violation is considered abated.

Labeling, OAC Rule 3745-52-34(A)(3): 2)

> Fulton Industries had three drums of F006 sludge being staged in the hoist line area that were not labeled with the words "hazardous waste." This violation was abated at the time of inspection.

- Satellite Accumulation Labeling, OAC Rule 3745-52-34(C)(1): Fulton Industries must send me a photograph showing that the container under the filter press is properly labeled with the words "Hazardous Waste" or other words identifying the contents of the container. On January 19, 2004, I received an email photograph of the labeled container. Therefore, this violation is considered abated.
- 4) <u>Container Management, OAC rule 3745-66-73(A)& (B):</u>
  Fulton Industries failed to keep the container in the wastewater treatment area which collects the F006 filter sludge closed. This container was also being handled in a way which caused it to leak on the ground into a trenched area.

During our inspection, the three drums were closed. To abate the remainder of the violation, Fulton industries must send me a photograph showing that the container under the filter press is closed when not in use and that the waste is no longer leaking on the ground to the trench.

On January 19, 2004, I received an email photograph of the labeled container. Therefore, this violation is considered abated. (Note: all electroplating operations were outsourced as of Feb. 2004)

5) Accumulation Start Date Labeling, OAC rule 3745-52-34(A)(2): The date upon which each period of accumulation begins must be clearly marked and visible for inspection on each container.

At the time of inspection, the accumulation start date of January 7, 2004 was marked on the roll-off. Also, the drums were marked with the start date of December 22, 2003. *Therefore, this violation is considered abated.* 

- Personnel Training, OAG Rule 3745-65-16(C):
   Because Fulton Industries properly trained all employees on hazardous waste management in 2003, this violation is considered abated.
- 7) Weekly Storage Area Inspections, OAC Rule 3745-66-74; To abate this violation, Fulton Industries must submit to Ohio EPA four (4) weeks of inspections for the wastewater treatment sludge (F006) storage area and for the drums located in the hoist line area. (this area is now considered a storage area).

On March 17, 2004, I received four weeks of completed inspection logs.

Therefore, this violation is considered abated.

8) Used Oil Labeling, OAC Rule 3745-279-22(C): All containers were properly labeled with the words "used oil" at the time of inspection. Therefore, this violation is considered abated. Mr. Bill Johnson November 3, 2004 Page 3

9) Used Oil Spill Clean Up, OAC Rule 3745-279-22(D):

On January 19, 2004, Fulton Industries mailed me a photograph of the area around the tank showing that it had been properly cleaned up. All cleaning residue was put in the used oil tank.

Therefore, this violation is considered abated.

10) Manifest Copies, OAC Rule 3745-52-40(A): On January 15, 2003, Fulton Industries faxed me copies of all missing manifests.

Therefore, this violation is considered abated.

11) Personnel Training (Job Descriptions), OAC Rule 3745-65-16(D):

To abate this violation, you must send me a copy of the updated job description which includes this training. This applies at a minimum to the plating positions.

On January 30, 2004, I received a copy of the updated job descriptions which included hazardous waste training. Therefore, this violation is considered abated.

My review of this documentation reveals that Fulton Industries has adequately demonstrated abatement of the violations discovered during our January 13, 2004, compliance evaluation inspection.

Fulton Industries also cleaned up all the residue that was on the old barrel line (EP)floor. I received a copy of the manifest on October 1, 2004. The waste was determined to be non-hazardous and was disposed of at Wayne Disposal Landfill in Michigan. I have placed documentation on our discussions regarding the waste determination on file. You also sent me photographs documenting the clean up of the old barrel line area on September 24, 2004.

If you should have any questions, please feel free to contact me at (419) 373-3114.

Sincerely,

Wendy A. Miller

Windhullon

Division of Hazardous Waste Management

Μr

pc: Cindy Lohrbach, DHWM-NWDO

Colleen Weaver, DHWM-NWDO Fulton Industries, NWDO File

ec: John Pasquerette, DHWM-NWDO

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State of Ohio Environmental Protection Agency

#### Northwest District Office

347 North Ounbridge Road Bowling Green, OH 43402-9398 TELE (419) 352-8461 FAX (419) 352-8468 www.upus.blan.ch.tus Ted Strickland, Gövernor Lee Fisher, Lieuterlant Gövernor Chris Korleski, Director

Re:

Fulton Industries OHD094810736 NOV-RTC Fulton County

August 19, 2008

Mr. Bill Sonnenberg Fulton Industries 135 East Linfoot Street Wauseon. Ohio 43567

Dear Mr. Sonnenberg

On August 8, 2008, Melissa Boyers and I conducted a hazardous waste compliance evaluation inspection of Fulton Industries located in Wauseon, Ohio, on behalf of the Ohio Environmental Protection Agency (Ohio EPA). This inspection was conducted in order to determine Fulton Industries' compliance with Ohio's hazardous waste laws as adopted under Chapter 3745 of the Ohio Administrative Code (OAC) and Chapter 3734 of the Ohio Revised Code (ORC). The Agency's inspection included a tour of your facility and a review of written documentation.

Fullon Industries provides stamping and assembly of parts for the automotive industry. All electroplating has been outsourced. Fulton Industries generates used oil which is recycled by Safety Kleen, parts washer solvent (which is part of the Safety Kleen continued use program), and universal waste bulbs which are recycled through H. Poll Electric at Environmental Recycling. Fulton Industries is a non-generator of hazardous waste.

Based on this inspection, Ohio EPA has determined that Fulton Industries has violated the following state hazardous waste regulations:

1. Universal Waste Fluorescent Bulb Labeling, OAC Rule 3745-273-14(E):
All packages and containers holding spent fluorescent bulbs are to be labeled with the words "Universal Waste - Lamps", "Waste Lamps" or "Used Lamps".

Fulton Industries had one box that was not labeled properly. Fulton Industries was using a sign over the storage area instead of labeling each package/container/box.

At the time of the inspection, the container was properly labeled with the words "Universal Waste Lamps". Therefore, this violation is considered abated.

Used Oil Labeling, OAC Rule 3745-279-22(C):

All tanks and containers used to store used oil must be clearly marked or labeled "used oil".

Fulton Industries failed to properly label the used oil tank with the words "used oil", instead it was labeled "waste oil"

Mr. Bill Sonnenberg August 19, 2008 Page 2

The tank was properly labeled with the words "used oil" at the time of inspection. Therefore, this violation is considered abated.

#### Recommendations:

- You may generate a small amount of solvent in the future from cleaning paint brushes due to touch up painting of the facility. You must evaluate the solvent by having analytical testing or by using generator knowledge. I recommend that you check with Safety Kleen or whoever is handling your used oil at the time you are ready for disposal as you may be able to mix your spent solvent in with your used oil shipment. You are only able to do this if you are a conditionally exempt small quantity generator per OAC Rule 3745-51-05(J).
- You should have your sandblast sand evaluated in the future when you are no longer using it and it is considered waste. You should have it analyzed for TCLP (Toxicity Characteristic Leachate Procedure) RCRA (Resource Conservation and Recovery Act) metals using SW-846 method 1311/6010. Most laboratories are familiar with this analysis.

You can find copies of the rules and other information on the division's web page at <a href="http://www.epa.state.oh.us/dhwm">http://www.epa.state.oh.us/dhwm</a>. Ohio EPA also has helpful information about pollution prevention at the following web address: http://www.epa.state.oh.us/ocapp/ocapp.html

If you should have any questions, please feel free to contact me at (419) 373-3114.

Sincerely.

Wendy A. Miller

Division of Hazardous Waste Management

/csl

Enclosure

cc: Cindy Lohrbach, DHWM-NWDO Colleen Weaver, DHWM-NWDO NWDO DHWM File Copy

Notice:

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.

# USED OIL INSPECTION CHECKLIST GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROH 1.	IBITIONS  Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes □ No ⊠ N/A □
	a. Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes ☐ No ☐ N/A 🏻
<b>A</b>	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes ☐ No ⊠ N/A ☐
	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes □ No □ N/A ⊠
	Multiple used oil checklists may be applicable if used oil handler is performing i sting used oil and shipping directly to a burner, complete generator and markete um).	
GENE 4	RATOR STANDARDS  Does the generator mix hazardous waste with used oil? If so,	Yes □ No ⊠ N/A □
	a. Is the mixture managed as specified in 3745-279-10(B)? [3745-279- 21(A)]	Yes 🗌 No 🗍 N/A 🛛
hazaro solely	. Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745- tous waste are subject to regulation as a hazardous waste, <u>unless</u> the listed haz because it exhibits a hazardous characteristic, and the resultant mixtures do no es of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-2	rardous waste is listed I exhibit a characteristic.
	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes □ No □ NA ☑
	. If used oil contains greater than 1000 ppm total halogens, it is presumed to be presumption is successfully rebutted.	e listed hezardous wast
6.	Does the generator store used cil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes ⊠ No 🔲 N/A 🗍
	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? (3745-279-22(B))	Yes ⊠ No 🗔 N/A 🗍
<b>3.</b>	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes ☐ No 🔀 WA 🗍

	Has t followi	he generato ng: (3745-27	r, upon detection o (9-22(D))	fia release of	used <b>oil, done the</b>	
		Stopped the	release?			Yes 🗌 No 🗐 NA 🔯
	19-10-10-10-10-10-10-10-10-10-10-10-10-10-	Contained t	he release?			Yes ☐ No ☐ N/A 🛛
	e. Cresis	Cleaned up	and properly manage	ed the used oil a	nd other materials?	Yes ☐ Ng ☐ N/A 🔯
			r replaced the contain f necessary?	èrs or lanks pr	r to returning them	Yes □ No □ N/A ⊠
10	Does	the state of the s	G IN SPACE HEATE or burn used oil in us	. 1 1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2	ce healers? [3745-	Yes □ No ⊠ WA □
			eater burn only used o eccived from house >			Yes I NO I WA 🖾
Empley (September 1)			or designed to have a BTU per hour?	maximum capa	ity of not more that	Yes ☐ No ☐ N/A ⊠
	1450	Are the corr	nbustion gases from h	eater vented to	ine ambient air?	Yes ☐ No ☐ WA ⊠
1 <b>1</b>	If the	jenerator se	ANSPORTATION If-transports used oil nt owned by the gene			Yes ☐ No ☐ N/A ⊠
			jenerator transport u r an employee of the			Yes ☐ No ☐ N/A ⊠
		Does the ge lime?(3745	enerator transport mo -279-24]	re Ihan 55 gallo	s of used oil at any	Yes ■ No □ NA ⊠
					sported by a transporte (olling arrangement)	er without a U.S. EPA II
12	Is the	DIY us∈ t	NTERS AND AGGRE oil collection center 279-20 to 3745-279-2	in compliance	with the generator	Yes ☐ No ☐ NA ⊠
13	Is the 279-3		d oil collection cente	r registered With	Ohio EPA? (3745-	Yes ☐ No ☐ WA 🗵
14.			regation point in comp 3745-279-247 [3745-2		enerator standards	Yes □ No □ NA ⊠
NOTE	Com	ilete Used O	il Generator and any	other applicable	sed oil handler check	list (e.g., marketer,

NOTE: Complete Use: Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

Keyword: UsedOilChec stforGenerators Oct 2007 doc

# SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS

Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less

PROH	BITIONS		enervoj divigilajdaj. Sveta stradnivas le t	
1	Did the SQUWH dispose of universal waste? [3745-273- 11(A)]	Yes□	No <u>X</u> NA_	RMK#
	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)]	Yes Q	No <u>X</u> N/A_	_RMK#
	<u>UNIVERSAL WASTE LAMPS</u>	uninikmi 1983 1984 - Paris	a process and construction of the construction	
	Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps?  Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)]	Yes_X	<u>. No D. NVA _</u>	RMK#
	Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)]	Yes_	No D. N/A _>	CRMK#
	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)?" [3745-273-14(E)]	Yes	No.X. N/A	_RMK#
	Treatment (such as crushing) by a UWH is prohibited under permitted for such activities [3745-273-31(B)]. A ger lamps according to hazardous waste rules (OAC Chapt generator treatment (OAC 3745-52-34). Crushed lamp hazardous waste transporter to a permitted hazardous manifest.	ierator cri er 37455 s must be	ushing lamps r 2). Lamp crus transported b	nust manage hing is a form y a registered
ACCL	MULATION TIME			

5. Is the waste accumulated for less than one year? [3745

273-15(A)] If not:

 Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] YesX\_No\_\_N/A\_\_RMK#\_\_

Yes No □ N/A X RMK#\_

NOTE:	Accum	ulation is defined as date generated or date received	f from anothe	r handler.			
		length of time the universal waste is stored nented by <u>one</u> of the following: [3745-273-15(C)]					
SELET SELECT SELECT SELECT SELECT SELECT SELECT SELECT SELECT SELECT SELECT SELECT		Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)]	Yes <u>-X</u> No		<b>RMK#</b>		
		Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)]	YesNo		RMK#		
		Maintaining an inventory system on site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)]	YesNo_	NA X	_RMK#		
		Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)]	YesNo_	N/A X	RMK#		
		Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)]	Yes <u>X</u> No		RWK#		
		Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)]	Yes <u>X</u> No <u>Paperwork s</u> <u>Univ Waste</u>	nowing las	RMK#_ t pick up of a		
EMPLO	<u>YEE 77</u>	R <u>AINING</u>					
	manaç handlir	nployees who handle or have the responsibility for ging universal waste informed of waste ng/emergency procedures, relative to their nsibilities? [3745-273-16]	Yes <u>X</u> Nol	J N/A	RMK#		

KEST	<u>ONSETO RELEASES</u>	rija jarihili Manuni yan			
8. 51.5	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes_	N6C	I WA <u>X</u>	_RMK#
9.	is the material released characterized? [3745273-17(B)]	Yes.	NoE	i N/A_2	<u> </u>
	If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)]	Yes	_ No C	i NA <u>-</u>	K RMK#
OFF:	<u>SITE SHIPMENTS</u>				
NOTE	E: If a SQUWH self-transports waste, then they must comply w requirements.	ith the	: Unive	sai Was	ite transporte
11.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745273-18(A)]		X No	O NA	RMK#
NOTE	: SQUWHs are prohibited to send waste to any other facility.				
12,	If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]	Yes.	X No	O NA	RMK#
	Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]	Yes.	X_No	D NA	, w. (4)
14	If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:				

							TO HE STATE OF THE STATE OF	
	<b>a</b> .	Receive the waste back? [3745-273-18(E)(1)]	Yes_	No	N/A	Х	RMK#	
	b	Agree to where the shipment will be sent? [3745 273-18(E)(2)]	Yes	. No	N/A			
15 22 23 23 24 24 24 24 24 24 24 24 24 24 24 24 24	handk	ndler rejects a partial or full load from another er, does the receiving handler contact the originating er and discuss <u>one of the following:</u>		_No 🗅	N/A			
	<b>.</b>	Sending the waste back to the originating handler? [3745-273-18(F)(1)]	Yes_	No	WA.	X	RMK#	
	<b>b.</b>	Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]	Yes	_No	WA.		RMK#	•
	that w	nandler received a shipment of hazardous waste as not universal waste, did the SQUWH immediately Ohio EPA? [3745-273-18(G)]	Yes_	_No 🗅	WA.		RMK#	
	univer	nandler received a shipment of nonhazardous, non- sal waste, was the waste managed in accordance pplicable law? [3745-273-18(H)]	Yes	_No G	N/A		RMK#	
<u>EXPO</u>	Y IS							
l <b>ä</b>	le was	ite being sent to a foreign destination? If so:	Yes_	No x	. W		RIKA	
		Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yeshi Mapriyan Lik	_No 🗅	WA:		RMK#	
		Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to -52-57? [3745-273-20(B)]	Yes_	_No D	WA.		FWK#	
		is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273- 20(C)]					RWK#	
CONTRACTOR SANCTON AND AND ADDRESS OF THE PARTY OF THE PA	Construit August College		continuo erronalei Leide				or Chicagolica College	

REMARKS



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 5

# <u>MEMORANDUM</u>

DATE: SUBJECT:		
SUBJECT:	: Determination of Need for an Investigation Facility Name: Fulton Industries, Inc.	
	EPA ID #: 040 094 810 736	
FROM:	: Kathleen Mille	
	Kathleen Miller, Environmental Protection Specialist	
TO:	: George Hamper, Chief, Corrective Action Section 2	
I recommend	nd the following determination regarding the need for an investigation:	
CA070NO	O Determination of Need for an Investigation-Investigation is not Necessary	
-	son for Determination	
∐Prei ∐PA	reliminary Assessment/Visual Site Inspection (PA/VSI) did not recommend any further a A/VSI recommendations do not warrant RRB attention	investigation
Pha	hase 1 Environmental Site Assessment (ESA) did not recommend further investigation	
Pha	hase 2 ESA did not recommend further investigation	
Pha	hase 1/Phase 2 ESA recommendations do not warrant RRB attention	
∐Cor	ompany representative asserts that the site is clean	
	ot subject to corrective action	
	nrolled in other clean-up program	
	A/VSI recommendations have been implemented	
*	uperfund Removal	
	articipating in Voluntary Remediation Program	
	ompleted Voluntary Remediation Program	
	aperfund Remedial Action	
	aperfund No Further Action Decision	
	uperfund Base Relocation and Closure	
Oth		
CA070YE	E Determination of Need for an Investigation – Investigation is Necessary	
Reasor	on for Determination	
PA/	A/VSI recommends further investigation	
∐ES <i>A</i>	SA recommends further investigation	
Oth	ther	
No determ	mination can be made - More Information Needed	
	☐Approved ☐Not Approved	
Signed	ed: Date:	

**Determination: Sampling** 

Facility Name: Fulton Industries, Inc.

# PA/VSI Or RFA FILE REVIEW CHECKLIST

EPA ID: OHD 094 810 736 Address: 135 E Linfoot Wauseon, Fulton Co., OH

Nam	e of Re	eviewer	: Maureen McHugh Date of Review: 9/3/08					
	1							
1	Yes	No	Is this a one folder site?					
2	Yes	No	Are there Superfund files for this site?					
3	Yes	No	Did you Read the Executive Summary?					
			There are:5_ SWMUs and1_ AOCs at this site.					
4	Yes	No	Did you review the regulatory history?					
5	Yes	No	Does the facility have interim status or a permit?					
			This facility is a:X_ (CE)SQG,LQG, orLess than 90 day.					
6	Yes	No	Was the Facility closed per RCRA? RCRAInfo 380 (1986)					
	If Yes, was the closure:X CC, or CIP.							
7	Yes	No	Are there documented (historical) releases? Briefly describe on Page 2.					
8	Yes	Nø	Were there releases identified during the inspection? Briefly describe on Page 2.					
9	Yes	No	Do you agree with the Conclusions and Recommendations?					
			If No, briefly describe on Page 2.					
As a	result o	of your r	eview of the PA/VSI or RFA file, please classify this site as:					
and :			corrective action recommended or warranted: These are sites that closed the regulated units. Us or AOCs at the site did not warrant any further corrective action (no historic releases or					
	•		observed during the Visual Site Inspection).					
of in SWI	vestiga MU or 2	tion that AOC and	ion Required: Soil or sediment sampling or groundwater sampling or monitoring or any type was recommended in the report in response to a documented or observed release at any d where such investigation, whether being addressed during the inspection or after, does not documentation in the facility record files.					
	More Information Needed: There is no RFA, PA/VSI or RCRA closure information available.							

# PA/VSI Or RFA FILE REVIEW CHECKLIST

Notes
INOTES
Briefly describe any documented (historical) releases for any SWMU or AOC recorded in the report. For each release,
please identify the SWMU or AOC and a one or two line description of release.
preudo luerani, una o la companya de
-In 1982, an unknown quantity of wastewater was released to the sanitary sewer. The sewer reached its capacity during
the release, causing automatic bypass valves to divert the release to North Turkeyfoot Creek. Five miles of the Creek were
the release, causing automatic bypass valves to divert the release to North Turkeyloot creek. Two miles of the creek were
affected and fresh kills were observed. Fulton installed emergency holding tanks.
-Samples taken during closure of the former sludge waste pile contained an average of 43mg/kg cyanide, 87mg/kg
cadmium, 2048mg/kg chromium, and 738mg/kg nickel. The contaminated soil was excavated and disposed of. Sampling
after removal showed that no samples contained statistically greater concentrations of contaminants than background
samples and the area was declared closed by the OEPA in 1986. (SWMU5)
Sumples and the area was accumented and a summer of the su
Briefly describe any releases observed during the inspection for any SWMU or AOC recorded in the report. For each
release, please identify the SWMU or AOC and a one or two line description of release.
The concrete trench network used to collect electroplating wastewater was in poor condition at the WWTP. An acrid,
acid-like odor was detected in the building. A facility representative indicated that the odor was sulfur dioxide.
acid-like odol was detected in the building. A facility representative indicated that the odol was suital dioxide.
to get the second of the secon
AOC1- The concrete floor at the east end of the barrel line was severely deteriorated. The floor surface was wet from
electroplating wastewater, which drains across the floor to a nearby trench.
PA/VSI Recommendations
FA/VSI RECommendations
a 1 4 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
-Conduct an industrial hygiene inspection in the WWTP to determine ambient sulfur dioxide air concentrations. Sample
the soil underlying floors and trenches with large cracks or gaps (SWMU1).
-Construct a concrete curb around the wastewater treatment sludge storage unit (SWMU2) to control runoff, construct a
curb around the waste oil drum storage area (SWMU3) to provide secondary containment.
-Sample soil for metals under the floor at AOC1 and rebuild the floor.
*



#### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

### REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

HRE-8J

September 8, 1993

Mr. Tom Gleckler Fulton Industries 135 East Linfoot Street Wauseon, Ohio 43567

Re:

Visual Site Inspection Fulton Industries, Inc. Wauseon, Ohio OHD 094 810 736

Dear Mr. Gleckler:

As indicated in the letter of introduction sent to you on January 13, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief

Minnesota/Ohio Technical Enforcement Section

RCRA Enforcement Branch

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PRC Environmental Management, Inc. 233 North Michigan Avenue Suite 1621 Chicago, IL 60601 312-856-8700 Fax 312-938-0118



#### PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

FULTON INDUSTRIES, INC. WAUSEON, OHIO OHD 094 810 736

FINAL REPORT

#### Prepared for

#### U.S. ENVIRONMENTAL PROTECTION AGENCY Office of Waste Programs Enforcement Washington, DC 20460

Work Assignment No. : C05087

EPA Region : 5
Site No. : OHD 094 810 736

 Date Prepared
 : May 22, 1992

 Contract No.
 : 68-W9-0006

 PRC No.
 : 009-C050870H2T

Prepared by : PRC Environmental Management, Inc.

(Michael Keefe)

Contractor Project Manager : Shin Ahn
Telephone No. : (312) 856-8700

Telephone No. : (312) 856-8700 EPA Work Assignment Manager : Kevin Pierard Telephone No. : (312) 886-4448

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# ENFORCEME IT CONFIDENTIAL

#### **EXECUTIVE SUMMARY**

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Fulton Industries, Inc. (Fulton), facility in Wauseon, Ohio. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The Fulton facility assembles flashlights and conducts metal stamping and electroplating operations for a variety of customers, including the federal government and the automotive industry. Production at the facility is organized into three divisions: automotive metal stamping, flashlight assembly, and electroplating. Operations in the electroplating division consist of parts cleaning, zinc, chrome, and tin electroplating, and surface oxidation processes. The facility operates a wastewater treatment plant (WWTP) to treat electroplating wastewater before it is discharged to the sanitary sewer system. Waste streams generated at the facility include wastewater treatment sludge (F006), nonhazardous waste oil, and scrap metal.

Fulton has operated at its present location since 1945. The facility occupies 15 acres in a mixed residential and industrial area. Facility operations are conducted in a 175,000-square-foot building. About 100 employees work at the facility.

Between 1979 and 1982, sludge generated by the WWTP was stored in a waste pile. This waste pile was specified in the facility's Part A permit application, which was submitted in October 1980. In 1982, Fulton removed the waste pile from the facility without notifying the Ohio Environmental Protection Agency (OEPA). In 1985, OEPA informed Fulton that it was required to undergo formal closure proceedings for the former sludge waste pile area. Consequently, Fulton submitted a closure plan to OEPA for the waste pile area. After Fulton excavated and sampled soil in the area, OEPA declared the waste pile closed in October 1986. The Fulton facility is currently regulated as a large-quantity generator of hazardous waste.

The PA/VSI identified the following five SWMUs and one AOC at the facility:

**SWMUs** 

1. Wastewater Treatment System

2. Wastewater Treatment Sludge Storage Unit

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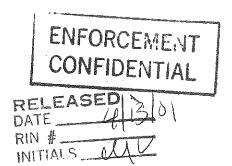
3. Waste Oil Drum Storage Area

4. Scrap Metal Storage Area

5. Former Sludge Waste Pile

**AOC** 

1. Floor at East End of Barrel Line



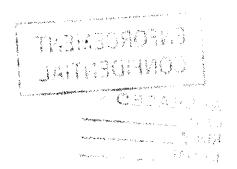
The Fulton facility is located in a mixed residential and industrial area. The surrounding environment is generally rural farm land. The nearest receptor is a residence just west of the facility boundary. The population of Wauseon is about 6,500. Surface drainage from the facility area is toward northern portions of North Turkeyfoot Creek, the natural surface water body nearest to the facility. With the exception of the Wauseon Reservoir, no large lakes lie within 4 miles of the facility. Lake Erie is 40 miles northeast of the facility and no wetland areas lie within 4 miles of the facility. The Fulton facility and residents of Wauseon receive potable water from the City of Wauseon. Wauseon's drinking water source is the Wauseon Reservoir, which is about 3 miles south of the facility.

The Fulton facility is surrounded by a chain-link fence topped by barbed wire. Access to the facility is also controlled by requiring visitors to register with a receptionist.

The potential for a release to air, ground water, or surface water from SWMU 1 is low. The potential for a release to soil from SWMU 1 is moderate to high because of the electroplating wastewater drainage trench network that transports wastewater to the WWTP. Many of the concrete trenches in this network are deteriorating, and cracks and gaps are present that may be exposing underlying soil. The trench network should be inspected and either sealed or reconstructed. Soil underlying trenches with large cracks or gaps should be sampled.

The potential for a release to air, soil, ground water, or surface water from SWMUs 2 through 5 is low. SWMU 2 manages wastewater treatment sludge (F006) on a concrete base and is covered to prevent runon. A curb should be constructed around this unit to prevent runoff from reaching nearby soils. SWMU 3 manages drums containing nonhazardous waste oil on pallets over a concrete base. Secondary containment in the form of a dike or curb is recommended for this unit. SWMU 4 manages scrap metal in metal bins and roll-off boxes. Contaminated soil associated with SWMU 5 was excavated and the unit was approved closed by OEPA. No further actions are suggested for SWMUs 4 and 5.

The potential for a release to air, ground water, or surface water from AOC 1 is low. However, a moderate to high potential exists for a release of electroplating wastewater to soil under this floor. The concrete floor has deteriorated, and numerous cracks and gaps in it expose the surface soil in some areas. The floor surface was wet and several puddles were observed. Soil under the floor should be sampled and the floor should be reconstructed.



#### 1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

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The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Fulton Industries, Inc. (Fulton), facility in Wauseon, Ohio. The PA was completed on January 16, 1992. PRC gathered and reviewed information from the Ohio Environmental Protection Agency (OEPA) and from EPA Region 5 RCRA files. The VSI was conducted on January 21, 1992. It included interviews with Fulton facility representatives and a walk-through inspection of the facility. Four SWMUs and two AOCs were identified at the facility.

PRC completed EPA form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and nine inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

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#### 2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

#### 2.1 FACILITY LOCATION

The Fulton facility is located at 135 East Linfoot Street, Fulton County, Ohio (latitude 41° 33'37" N, longitude 84°08'35" W). The facility occupies 15 acres in a mixed residential and industrial area. The facility is bordered on the north by farm land, on the west by a residence, on the east by the Multi-Cast Company, and on the south by a residential neighborhood and the Village of Wauseon (see Figure 1).

#### 2.2 FACILITY OPERATIONS

The Fulton facility consists of two structures: a large manufacturing plant and a small wastewater treatment plant (WWTP). Facility operations began in 1945, when portions of the east wing of the main plant were constructed. The plant building currently has 175,000 square feet of floor space. About 100 employees work at the facility in two shifts, 5 days a week.

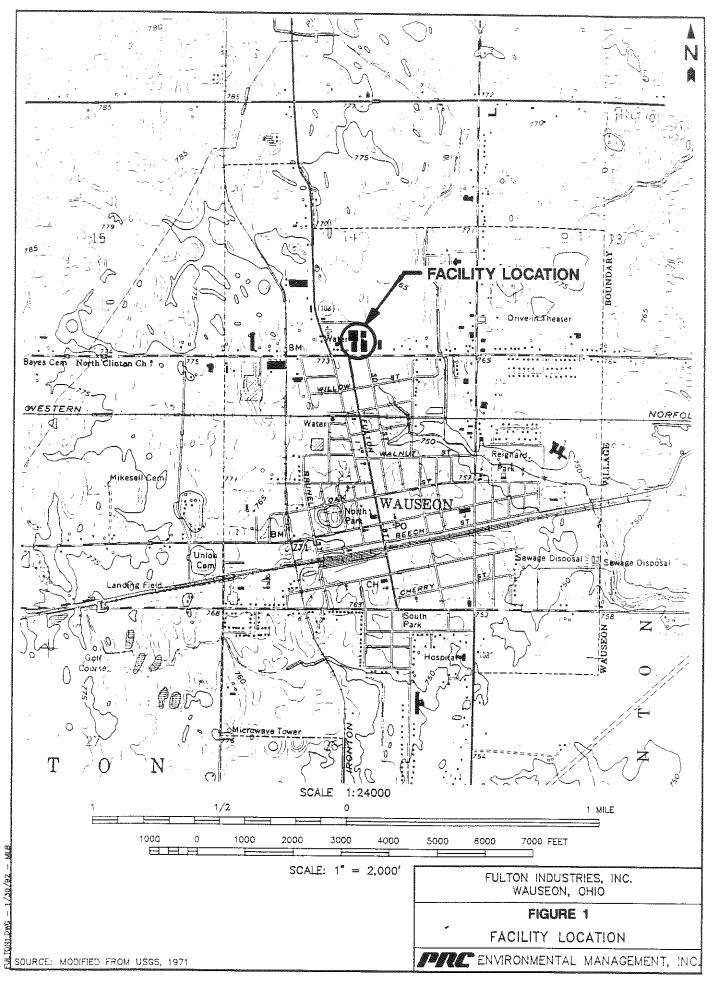
The Fulton facility assembles flashlights and conducts metal stamping and electroplating operations for a variety of customers, including the federal government and automotive industry. Operations at the facility have not changed significantly since the 1950s. Facility production operations are currently organized into three divisions: automotive metal stamping, flashlight assembly, and electroplating. These three divisions are discussed below.

The automotive metal stamping division produces a variety of small parts stamped from steel, brass, or copper coils. The facility operates heavy-, medium-, and light-weight metal presses.

Flashlights are assembled from plastic parts premolded off site and from small, stamped, metal parts manufactured by the facility. Most Fulton flashlights are purchased by the federal government.

Operations in the electroplating division include parts cleaning, zinc, chrome, and tin electroplating, and surface oxidation processes. Zinc and chrome electroplating are the principal activities in the electroplating division; other processes, such as parts cleaning, are associated with

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electroplating activities or are performed on a job-specific basis (for example, tin electroplating and surface oxidation). Surface oxidation is used to alter the color of a metal part. Electroplating is conducted on both rack- and barrel-type process lines. The locations of these lines are shown in Figure 2. Before 1989, Fulton also conducted copper, nickel-chrome, and silver electroplating operations. These processes were discontinued to eliminate cyanides from the facility's waste streams.

#### 2.3 WASTE GENERATING PROCESSES

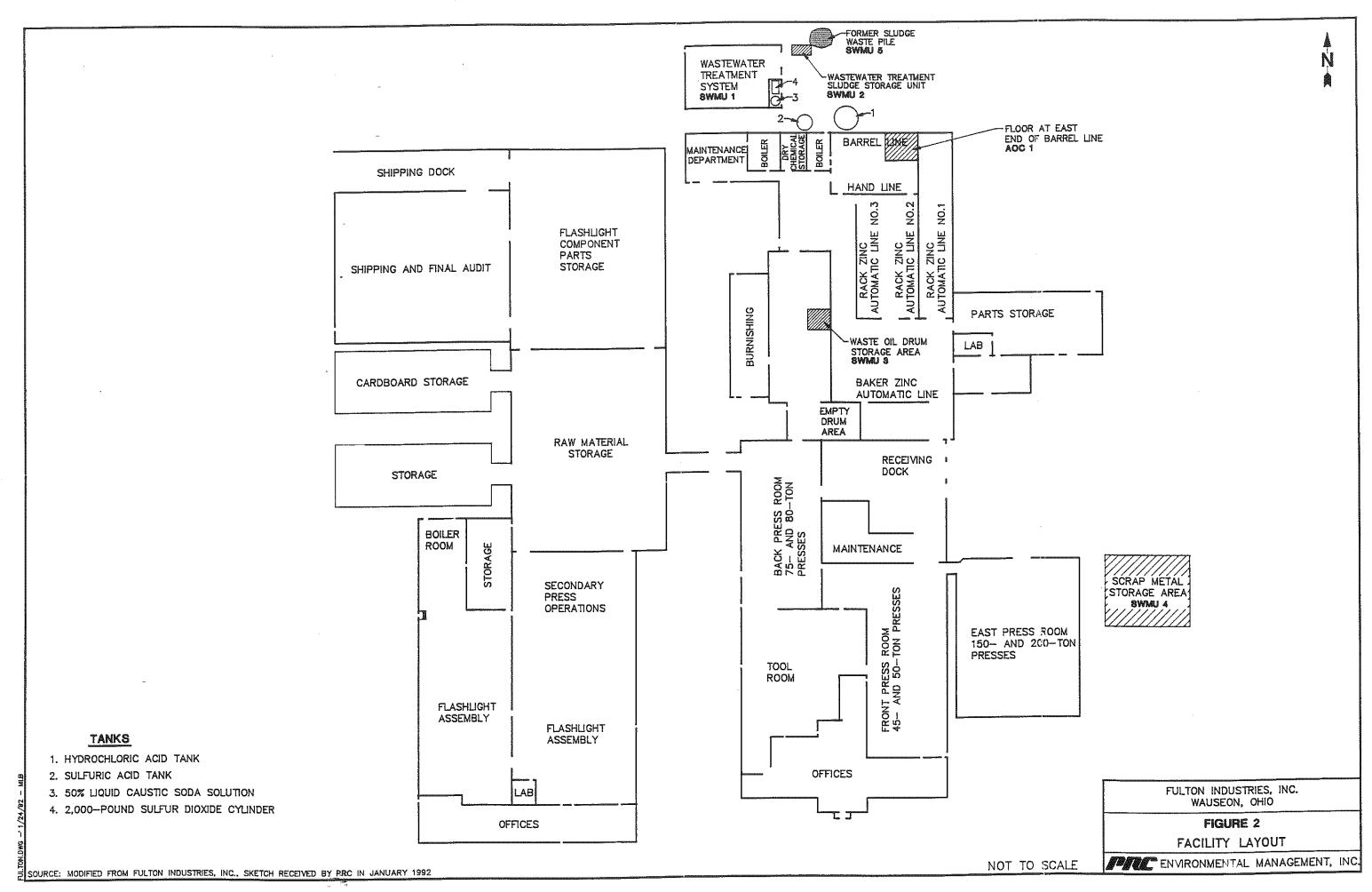
The PA/VSI identified the five SWMUs listed in Table 1. The locations of the SWMUs are shown in Figure 2. Waste generating processes for the automotive metal stamping division and the electroplating division are described in this section. Wastes generated by these divisions are listed in Table 2. The flashlight assembly division does not generate any solid wastes.

Wastes generated by the automotive metal stamping division include scrap metal and water-soluble waste lubricating oils. Scrap metal is segregated by type (for example, bare steel, coated steel, brass, and copper) and stored in small bins or large roll-off boxes (SWMU 4; see Photograph No. 4). Scrap metals are sold to various metal recyclers at market prices.

Water-soluble waste lubricating oil from machining operations in the automotive metal stamping division is accumulated and stored in 55-gallon drums. Drums of this nonhazardous waste oil are stored on pallets in an outdoor waste oil drum storage area (SWMU 3; see Photograph No. 5). The pallets are stacked two high. Periodically, full drums of waste oil are picked up from the storage area by Cousins Waste Management of Toledo, Ohio, for reclamation.

Wastewater (primarily rinse water) from the electroplating division is treated in an on-site WWTP (SWMU 1; see Photograph Nos. 6 and 7) before being discharged to the sanitary sewer. The WWTP was constructed in 1979; before that time wastewater was accumulated and treated on a batch basis. The WWTP is comprised of several below ground concrete basins (see Figure 3). Wastewater containing hexavalent chromium is piped directly to a treatment basin in which the chromium is reduced by gaseous sulfur dioxide. Treated wastewater containing chromium flows to a pH adjustment basin where the wastewater joins other wastewater from the electroplating division. All wastewater not containing chromium flows to the WWTP through a network of concrete floor trenches (SWMU 1; see Photograph Nos. 1 and 2) surrounding the electroplating lines. Small amounts of waste electroplating solutions are also generated by analytical procedures in the facility's laboratories. These wastes are combined with the electroplating wastewaters and are treated by the WWTP.

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TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
	Wastewater Treatment System	No	Active
2	Wastewater Treatment Sludge Storage Unit	No ,	Active
3	Waste Oil Drum Storage Area	No	Active
4	Scrap Metal Storage Area	No	Active
5	Former Sludge Waste Pile	Yes	Closed; RCRA closure approved in 1986

# Note:

<sup>\*</sup> A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

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# TABLE 2

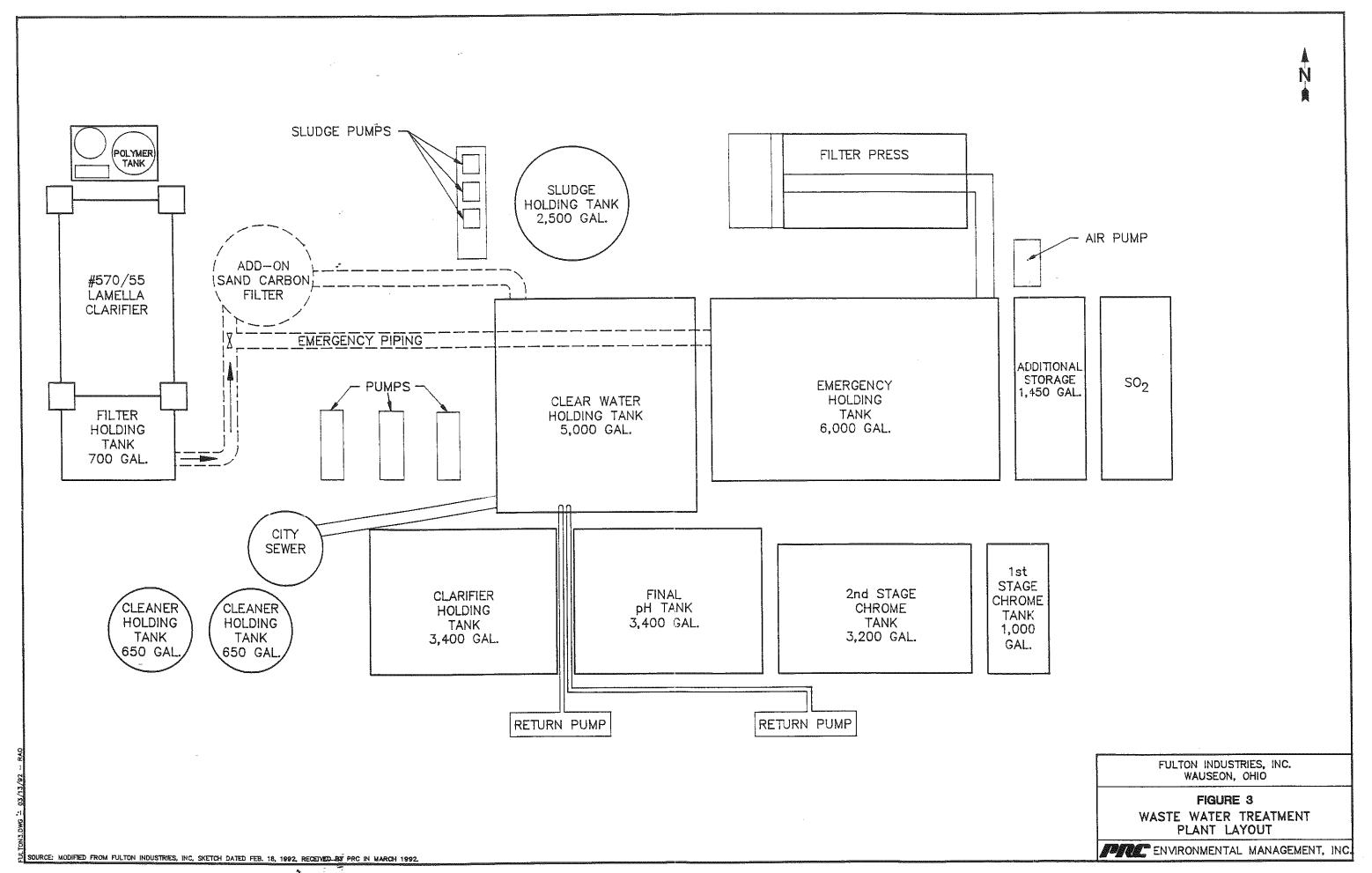
## SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Scrap Metal/NA**	Metal stamping	SWMU 4
Water-Soluble Waste Oil/NA	Metal stamping	SWMU 3
Wastewater Treatment Sludge/F006	Electroplating	SWMUs 1, 2, and 5
Waste Rinsewater	Electroplating	SWMU 1

## Notes:

- \* Primary management unit refers to a SWMU that currently manages or formerly managed the waste.
- \*\* Nonapplicable (NA) designates nonhazardous waste

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Wastewater treatment consists of pH adjustment, flocculation, and sedimentation to produce metal hydroxide sludge (F006). This sludge is dewatered in a filter press and stored in a 26-cubic-yard roll-off box (SWMU 2; see Photograph No. 8) before it is transported to Envirite in Canton, Ohio, for treatment and disposal. Currently, the Fulton facility generates 13 to 15 tons of F006 sludge every 6 to 8 weeks. Before metal-cyanide electroplating operations were discontinued in 1989, 13 to 15 tons of F006 sludge were generated every 3 to 4 weeks.

Between 1979 and 1982, sludge generated by the WWTP was stored in a sludge waste pile (SWMU 5; see Photograph No. 9) about 40 feet east of the WWTP building. The sludge waste pile was removed in 1982 and the area was cleaned up during the facility's RCRA closure in 1985 (see Sections 2.4 and 2.5 for more closure details).

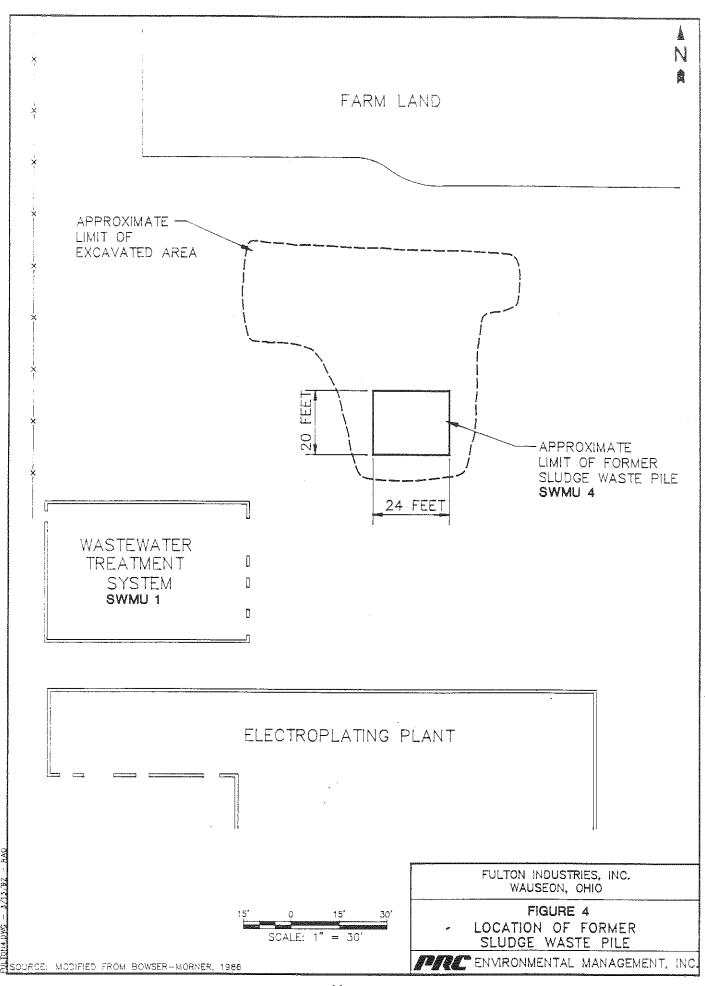
## 2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the Fulton facility.

On November 8, 1982, an unknown quantity of wastewater was released from the WWTP to the sanitary sewer. The sanitary sewer reached its capacity during the release causing automatic bypass valves to divert the release to North Turkeyfoot Creek. Five miles of the creek were affected and fish kills were observed (OEPA, 1982). The release from the WWTP was caused by a valve failure. Fulton responded by installing emergency holding tanks in line before the sewer system.

During closure of the former sludge waste pile (SWMU 5), soil samples were collected and analyzed to define the extent of contamination. Samples collected in 1985 contained an average of 43 milligrams per kilogram (mg/kg) cyanide, 87 mg/kg cadmium, 2,048 mg/kg chromium, and 738 mg/kg nickel (Bowser-Morner, 1986). Background levels were below detection limits for cyanide (0.5 mg/kg) and cadmium (1 mg/kg) and approximately 33 and 63 mg/kg for chromium and nickel, respectively. In April and May 1986, contaminated soil in the former sludge waste pile area was excavated and disposed of. The locations of the waste pile and excavated area are shown in Figure 4. After excavation, soil samples were collected to a depth of 10 inches and analyzed. Analytical results were evaluated using the Student's t-test at a 0.01 level-of-significance. None of the samples collected from the excavated area contained statistically greater concentrations of contaminants than background samples (Bowser-Morner, 1986).

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## 2.5 REGULATORY HISTORY

Fulton submitted a Notification of Hazardous Waste Activity to EPA in August 1980 to generate and treat, store, or dispose of hazardous waste (Fulton, 1980a). Fulton submitted a Part A permit application to EPA in October 1980 to store F006 waste in a waste pile (S03) (Fulton, 1980b).

In June 1982, the sludge waste pile was removed by Fondessy Enterprises, Inc., and the sludge was disposed of in a permitted hazardous waste landfill (Bowser-Morner, 1986). No formal closure documentation was prepared when the waste pile was removed. In June 1985, OEPA inspected the facility (OEPA, 1985a) and subsequently notified Fulton that it was required to undergo formal closure proceedings (OEPA, 1985b). In July 1985, Fulton submitted a closure plan describing the 1982 removal actions and a proposed sampling plan for the former sludge waste pile area (Fulton, 1985a). The closure plan was revised in October 1985 (Fulton, 1985b) and approved by OEPA (OEPA, 1985c). Soil samples were collected from the former sludge waste pile area in November 1985 and analyzed for cadmium, chrome, and nickel. Analytical results indicated that soils in and around the waste pile area were contaminated. Contaminated soils were excavated and disposed of at the Fondessy Enterprises, Inc., landfill in Oregon, Ohio (Bowser-Morner, 1986). Additional soil samples were collected in March 1986. Analytical results indicated that contaminated soil was present adjacent to the excavated area. This area was excavated in April 1986 (Fulton, 1986). In May 1986, metal concentrations in soil samples obtained from excavated areas did not statistically exceed background levels. The sludge waste pile was certified closed by an independent, registered professional engineer in June 1986 (Bowser-Morner, 1986). OEPA conducted a closure inspection in July 1986 (OEPA, 1986a) and declared the former sludge waste pile closed the following October (OEPA, 1986b).

In March 1988, a load of F006 hazardous waste sludge was rejected for disposal by the Envirosafe facility in Oregon, Ohio, because it contained foreign material. Envirosafe returned the shipment to the Fulton facility and Fulton discovered that the foreign material was oil absorbent used to clean up a machine oil spill. Fulton separated the oil absorbent from the rejected sludge and returned the sludge to Envirosafe, which accepted it for disposal. The oil absorbent was disposed of at the local solid waste landfill (Eastman & Smith, 1990). In November 1988, OEPA conducted a RCRA compliance inspection of the Fulton facility and cited violations associated with the rejected waste shipment of March 1988. According to the "mixture rule," the oil absorbent became hazardous waste after mixture with the sludge. Both EPA and OEPA issued formal notices of violation (NOV) in April and May 1989, respectively (EPA, 1989a; OEPA, 1989). EPA issued a second NOV in September 1989, because Fulton did not address violations cited in the April 1989 NOV (EPA, 1989b). Fulton's failure to respond to the NOVs led to

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enforcement action by OEPA in 1990. A Complaint for Injuncture Relief and a Civil Penalty was drafted in July 1990 (Cleveland, 1990). The Civil Penalty was settled out of court in March 1991, and a Consent Order was signed in July 1991 (Cox, 1991) (OEPA, 1991a). In July 1991, OEPA notified Fulton that it was in compliance with environmental regulations (OEPA, 1991b).

#### 2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the Fulton facility.

#### 2.6.1 Climate

The climate in Fulton County is generally continental, moderated somewhat by Lake Erie, which is 40 miles northeast of Wauseon, Ohio. On the average, the temperature is 90°F or higher on only 15 days a year, and below 0°F on only 8 days a year. The average monthly temperature is 48.5°F. The lowest average monthly temperature is 14.5°F in January. The highest average monthly temperature is 83.8°F in July (USDA, 1984).

Precipitation is well-distributed throughout the year, but peaks moderately in summer. The average annual total precipitation is about 37 inches. The 1-year, 24-hour maximum rainfall is 3.31 inches. The mean annual lake evaporation is 30 to 32 inches. Total annual snowfall in the area averages about 37 inches (NOAA, 1989).

The prevailing wind is from the west. Average monthly wind speed is highest in March at 11.1 miles per hour from the west and lowest in August at 7.1 miles per hour from the southwest. The average annual wind speed is 9.4 miles per hour from the west (NOAA, 1989).

#### 2.6.2 Flood Plain and Surface Water

The gently rolling terrain of the central part of Fulton county has a complex drainage system that flows to the northeast, southwest, and southeast. The area around the Fulton facility drains to northern portions of North Turkeyfoot Creek, which is 0.5 mile southeast of the facility. North Turkeyfoot Creek is the nearest natural surface water body to the facility and it flows southeast into the Maumee River (USDA, 1984). With the exception of the Wauseon Reservoir, no large lakes lie within 4 miles of the Fulton facility. No wetland areas lie within 4 miles of the facility either. The facility is not located within a 100-year flood plain.

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## 2.6.3 Geology and Soils

Fulton County lies mostly within past glacial lake stages of Lake Erie. These lake stages formed the present surface geology of the county. Several long, narrow beach ridges remain that formed along the shorelines of these old lakes. Part of a large beach of a former lake remains in the southeastern part of the county and is known as the "Oak Openings." Deposits of lacustrine and deltaic sediments are mainly in the western part of the county. Areas of glacial till that were reworked by lake action are in the eastern and in the central parts of the county, near Wauseon.

The soils of Fulton County originated from glacial till and deposits in glacial lakes. Glacial deposits cover all of Fulton County. These deposits range from 50 to 250 feet in thickness. Shale bedrock underlies the glacial deposits. Soils in the area immediately around the Fulton facility are predominantly Blount loam or Pewamo clay loam (USDA, 1984).

Blount loam is a somewhat poorly drained soil on ground moraines and end moraines. The surface layer is a dark grayish brown, friable loam about 10 inches thick. The subsoil and substratum consist of dark yellowish brown and dark grayish brown, mottled, firm clay loam about 15 and 60 inches thick, respectively. Runoff is medium on Blount soil and permeability is moderately slow to slow. The available water capacity is moderate. The seasonal high water table is usually 1 to 3 feet below ground surface in winter and spring. Most areas of this soil are used for cropland (USDA, 1984).

Pewamo clay loam is often associated with Blount loam. Pewamo clay loam is found in narrow areas along drainage ways and low spots. The surface layer is typically very dark grayish brown, firm clay loam about 10 inches thick. The subsoil is about 47 inches thick and is dark gray and gray, mottled, firm clay loam, clay, and silty clay. The substratum extends to about 60 inches and is gray and dark yellowish brown, firm silty clay loam. Runoff is very slow. Permeability is moderately slow. Soil moisture is a moderate limitation when Pewamo soil is used for cropland (USDA, 1984).

#### 2.6.4 Ground Water

Site-specific information was not available; therefore, regional information is presented.

Most ground-water sources in Fulton County are identified as seams or strata of sand and gravel in the glacial till. The underlying shale bedrock is not commonly a good source of ground water. In the Oak Openings area, the shoreline of a former glacial lake, ground water is present

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in sand layers above impervious glacial till. A belt of artesian wells is on both sides of the Tiffon River and Bean Creek, about 10 miles west-northwest of Wauseon (USDA, 1984).

#### 2.7 RECEPTORS

The Fulton facility occupies 15 acres in a residential and industrial area in Wauseon, Ohio. The area surrounding Wauseon is rural farm land. Wauseon has a population of about 6,500.

The Fulton facility is bordered on the north by farm land, on the west by a residence, on the east by the Multi-Cast Company, and on the south by a residential neighborhood and the City of Wauseon (see Figure 1). The nearest school is about 1 mile east-southeast of the facility. Facility access is controlled by a chain-link fence topped by barbed wire and a security alarm system, and by requiring visitors to register with a receptionist.

The nearest surface water body is North Turkeyfoot Creek, which is about 0.5 mile southeast of the facility. The North Turkeyfoot Creek is not a major recreational water body. The Wauseon Reservoir, 3 miles south of the facility, is the largest surface water body in the area. No lakes lie within 4 miles of the facility. Lake Erie is approximately 40 miles northeast of the facility.

The Fulton facility and residents of Wauseon receive potable water from the City of Wauseon. Wauseon's drinking water source is the Wauseon Reservoir. The reservoir is fed by two unnamed ditches. During periods of drought, two ground-water wells may be used to replenish the reservoir. The ground-water wells are near the Wauseon Reservoir, about 3 miles south of the facility.

Sensitive environments are not located on site. No wetland areas lie within 4 miles of the facility.

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#### 3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the five SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC observations.

SWMU 1

Wastewater Treatment System

Unit Description:

The wastewater treatment system consists of a WWTP and the associated trench and pipe network used to transport electroplating wastewater to the WWTP. The WWTP is comprised of eight below ground concrete basins, and the following aboveground units: a lamella clarifier, sand filter, sludge holding tank, and filter press. The aboveground units are constructed from steel. The volumes of the WWTP tanks and basins are shown in Figure 3.

Wastewater containing hexavalent chromium is piped directly to a treatment basin in which the chromium is reduced by gaseous sulfur dioxide (stored in a tank on site). Treated wastewater containing chromium flows to a pH adjustment basin where the wastewater joins other wastewater from the electroplating division. All wastewater not containing chromium flows to the WWTP through a network of concrete floor trenches surrounding each electroplating line. The drainage system surrounding many of the process lines is not well defined.

Following hexavalent chromium treatment and combination with wastewater not containing chromium, treatment consists of pH adjustment, flocculation, sedimentation, and filtration. Sludge is dewatered in a filter press and stored in a roll-off box (SWMU 2). Filtrate from the filter press is returned to the treatment system. Treated water is discharged to the sanitary sewer. Typical concentrations of metals in the treated water include 0.30 milligrams per liter (mg/L) chromium, 0.67 mg/L copper, 0.31 mg/L nickel, and 1.5 mg/L zinc.

Date of Startup:

This unit started operating in 1979.

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Date of Closure:

This unit is active.

Wastes Managed:

Processes that generate wastewater treated by this unit include parts cleaning, zinc, chrome, and tin electroplating, zinc phoscoating, and surface oxidation.

Release Controls:

The holding and treatment basins in the WWTP are concrete and below ground. No secondary containment is associated with these basins. If a system upset occurs, water can be retained in the 6,000-gallon emergency holding basin by closing the valve to the sewer system. The basins are drained and inspected every 6 months and repairs are made if necessary.

No release controls are associated with the trench network used to transport electroplating wastewater to the WWTP.

History of Documented Releases:

On November 8, 1982, an unknown quantity of wastewater was released from the WWTP to the sanitary sewer. The sanitary sewer reached its capacity during the release causing automatic bypass valves to divert the release to North Turkeyfoot Creek. Five miles of the creek were affected and fish kills were observed (OEPA, 1982). The release from the WWTP was caused by a valve failure. Fulton responded by installing an emergency holding tank in line before the sewer system.

Observations:

The concrete trench network used to collect electroplating wastewater was in poor condition. The concrete was deteriorating throughout the network. In some areas, drainage channels formed in the concrete floor from years of exposure to corrosive liquids. Soil beneath the floor should be sampled.

An acrid, acid-like odor was detected in the WWTP building; both inspectors began coughing after a few minutes in the building. A facility representative indicated that the odor was sulfur dioxide, which is used to treat wastewater containing chromium.

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SWMU 2

Wastewater Treatment Sludge Storage Unit

Unit Description:

Wastewater treatment sludge generated by the wastewater treatment system (SWMU 1) is stored in a 26-cubic-yard metal roll-off box.

The roll-off box is outside, east of the WWTP building.

Date of Startup:

This unit started operating in 1982.

Date of Closure:

This unit is active.

Wastes Managed:

Wastewater treatment sludge (F006) produced by SWMU 1 is stored

for less than 90 days in this unit.

Release Controls:

The sludge roll-off box is stored on a concrete pad. The exact dimensions of the pad were not noted during the VSI because portions of the pad were covered with snow. There is no other

secondary containment associated with this unit.

History of Documented

Releases:

No releases were noted in the documents available for the PA file

review or during the VSI.

Observations:

The sludge roll-off box was covered with a tarpaulin. Portions of the concrete base surrounding the unit were covered by recent snowfall. No releases or stains were observed on visible portions of the pad. The pad did not appear to be sloped in any direction.

SWMU 3

Waste Oil Drum Storage Area

Unit Description:

Waste oil drums are stored outdoors in this SWMU on wood pallets stacked two high. The storage area is along the west outside wall

of the electroplating area (see Figure 2).

Date of Startup:

This unit began operating in 1990.

Date of Closure:

This unit is active.

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Wastes Managed:

This unit manages nonhazardous water-soluble waste oil generated by the automotive metal stamping division. Drums containing this waste oil are picked up by Cousins Waste Management in Toledo, Ohio, for reclamation.

Release Controls:

Drums are stored on pallets on a concrete base. No secondary containment is associated with this unit.

History of Documented Releases:

No releases were noted in the documents available for the PA file review or during the VSI.

Observations:

The base of this unit was not observed because of recent snowfall. About forty 55-gallon drums were present during the VSI. Small dents and corrosion around the bung of some drums were observed. No severely damaged or leaking drums were visible during the inspections; however, because of their location on pallets, not all drums were observed. The concrete pad did not appear to be sloped in any direction.

SWMU 4

Scrap Metal Storage Area

Unit Description:

This unit consists of steel roll-off boxes and bins used to store scrap metal from the automotive metal stamping division. This area is outdoors just east of the east press room (see Figure 2).

Date of Startup:

This unit began operating in the early 1980s; the exact year is unknown.

Date of Closure:

This unit is active.

Wastes Managed:

This unit manages scrap metal, which is segregated into bare steel, coated steel, brass, and copper.

Release Controls:

Storage bins and roll-off boxes are on asphalt or concrete. No other release controls are associated with this unit.

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History of Documented

Releases:

No releases were noted in the documents available for the PA file

review or during the VSI.

Observations:

The base around this unit was partially obscured by recent

snowfall.

SWMU 5

Former Sludge Waste Pile

Unit Description:

This unit was a 20-by-24-foot area northeast of the WWTP (see

Figure 4). Sludge waste was stored outside in piles on the ground

surface.

Date of Startup:

This unit began operating in 1979.

Date of Closure:

This unit stopped operating in 1982 and was RCRA-closed in 1986.

Wastes Managed:

This unit managed electroplating wastewater treatment sludge

(F006).

Morner, 1986).

Release Controls:

No release controls were associated with this unit.

History of Documented Releases:

Soil samples collected from the area around this unit during RCRA closure contained an average of 43 mg/kg cyanide, 87 mg/kg cadmium, 2,048 mg/kg chromium, and 738 mg/kg nickel.

Contaminated soil associated with this unit was excavated during closure. All samples collected from the excavated area had contaminant concentrations that were statistically similar to background soil levels. Background soil samples had the following contaminant levels: below detection limit for cyanide (0.5 mg/kg) and cadmium (1 mg/kg) and approximately 33 and 63 mg/kg for chromium and nickel, respectively (see Section 2.4) (Bowser-

Observations:

The ground surface was not observed because of recent snowfall.

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## 4.0 AREAS OF CONCERN

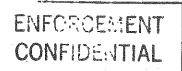
PRC identified one AOC during the PA/VSI. This AOC is discussed below.

## AOC 1

## Floor at East End of Barrel Line

The concrete floor at the east end of the barrel line is severely deteriorated. Numerous cracks and gaps are present in the concrete and surface soil may be exposed in some areas. During the VSI, the floor surface was wet from electroplating wastewater, which drains across the floor to a nearby trench. Several puddles were observed throughout the area.

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#### 5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified five SWMUs and one AOC at the Fulton facility. Background information on the facility's location, operations, waste generating processes, release history, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3 summarizes the SWMUs and AOC at the Fulton facility and recommended further actions.

SWMU 1

Wastewater Treatment System

Conclusions:

This unit consists of a wastewater drainage trench network and a WWTP. Fugitive sulfur dioxide releases to the air in the WWTP were observed. The potential for a release to soil, ground water, or surface water from the WWTP is low. The WWTP holding and treatment basins appeared to be in good condition. However, a moderate to high potential for a release to onsite soils exists from the trench network that drains electroplating wastewater to the WWTP. The structural integrity of the trench network is poor and releases may be occurring to soil through cracks and gaps in the concrete trenches.

Recommendations:

An industrial hygiene inspection should be conducted in the WWTP to determine ambient sulfur dioxide air concentrations. Soil underlying floors or trenches with large cracks or gaps should be sampled and analyzed for metals. After sampling, the trench network serving the WWTP should be inspected and sealed or reconstructed.

SWMU 2

Wastewater Treatment Sludge Storage Unit

Conclusions:

The potential for a release to air, soil, ground water, or surface water is low. Sludge is stored in a covered, metal roll-off box on a concrete base.

Recommendations:

Because the concrete base was partially obscured by snow, the base should be reinspected. A concrete curb should be constructed around this unit to control runoff.

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### TABLE 3 SWMU and AOC SUMMARY

	<u>SWMU</u>	Dates of Operation	Evidence of Release	Recommended Further Action
e e e e e e e e e e e e e e e e e e e	Wastewater Treatment System	1979 to present	Fugitive sulfur dioxide releases to the air in the WWTP were observed. Generally poor condition (cracks and gaps) of the wastewater drainage trench network suggests potential soil contamination.	Conduct an industrial hygiene inspection to determine ambient sulfur dioxide air concentrations. Sample soil for metals under floor and trenches with large cracks or gaps; inspect and seal or reconstruct wastewater drainage trench network
2.	Wastewater Treatment Sludge Storage Unit	1982 to present	No releases were observed on the portion of the concrete base visible during the VSI.	Construct a curb around this unit to control runoff.
3.	Waste Oil Drum Storage Area	1990 to present	No releases were observed on the portion of the concrete base visible during the VSI.	Construct curb around this area to provide secondary containment
4.	Scrap Metal Storage Area	Early 1980s to present	None	No further action recommended
5.	Former Sludge Waste Pile Area	1979 to 1982	Surface soils contaminated with metals	The area was approved RCRA-closed in 1986; no further action recommended
	<u>AOC</u>	Dates of Operation	Evidence of Release	Recommended Further Action
1.	Floor at East End of Barrel Line	Unknown to present	Deteriorated concrete floor suggests potential soil contamination	Sample soil for metals under the floor and rebuild the floor
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SWMU 3

Waste Oil Drum Storage Area

Conclusions:

The potential for a release to air, soil, ground water, or surface water is low. Drums of nonhazardous waste oil are stored two high on pallets on a

concrete base.

Recommendations:

A curb should be constructed around this area to provide secondary

containment.

SWMU 4

Scrap Metal Storage Area

Conclusions:

The potential for a release to air, soil, ground water, or surface water from this unit is low. This unit stores nonhazardous scrap metal in containers.

Recommendations:

No further actions are suggested.

SWMU 5

Former Sludge Waste Pile

Conclusions:

No potential for a release to air, soil, ground water, or surface water exists

from this unit because it no longer manages waste. Former waste

management activities associated with this unit resulted in contamination of on-site soils. However, contaminated soil was excavated and the area was approved RCRA-closed by OEPA. After excavation, contaminant levels were not statistically greater than background levels (see Section 2.4).

Recommendations:

No further actions are suggested.

AOC 1

Floor at East End of Barrel Line

Conclusions:

The potential for a release to air, ground water, or surface water is low. The potential for a release to on-site soils is moderate to high. The concrete floor is in poor condition and soil beneath the floor may be exposed to electroplating wastewater.

Recommendation:

Soil underlying cracked flooring in this area should be sampled and analyzed for metal contamination and the floor should be rebuilt and sealed.

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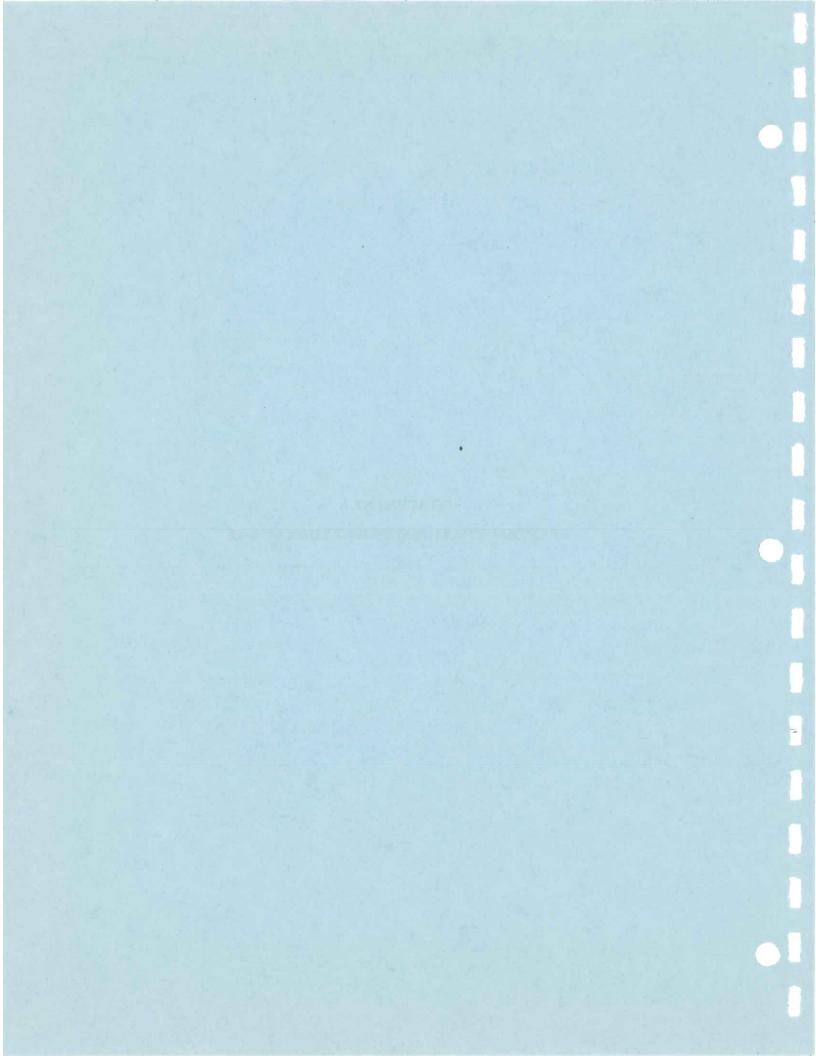
#### REFERENCES

- Bowser-Morner, 1986. Closure of Former Sludge Waste Pile Report from Glen Fitkin to Richard Cheney, Fulton Industries, Inc. (Fulton), June 2.
- Cleveland, Karen, 1990. Memorandum from Karen Cleveland, Ohio Assistant Attorney General, to Jeff Mayhugh, Ohio Environmental Protection Agency (OEPA), July 18.
- Cox, David, 1991. Letter from David Cox, Ohio Assistant Attorney General, to Joseph Gregg, Eastman & Smith, March 8.
- Eastman & Smith, 1986. Letter from Richard Sargeant to OEPA, March 17.
- Eastman & Smith, 1990. Letter from Joseph Gregg to Brian Babb, OEPA, January 5.
- Fulton, 1980a. Notification of Hazardous Waste Activity, EPA Form 8700-12, August 8.
- Fulton, 1980b. EPA Part A Permit Application, signed October 15.
- Fulton, 1985a. Closure Certification Plan, July 18.
- Fulton, 1985b. Revised Closure Certification Plan, October 18.
- Fulton, 1986. Letter from Richard Cheney to David Ferguson, OEPA, May 8.
- National Oceanic and Atmospheric Administration (NOAA), 1989. Local Climatological Data, Annual Summary with Comparative Data, Toledo, Ohio.
- OEPA, 1982. Initial Pollution Incident Report, November 9.
- OEPA, 1985a. Field Activity Report by Dave Ferguson, June 3.
- OEPA, 1985b. Letter from Tom Carlisle to Daniel Banaszek, U.S. Environmental Protection Agency (EPA) Region 5, July 17.
- OEPA, 1985c. Interoffice Communication from Dave Ferguson to Tony Asaaon, October 25.
- OEPA, 1986a. Interoffice Communication from Dave Ferguson to Thomas Crepeau, July 28.
- OEPA, 1986b. Letter from Dan Fisher to Richard Cheney, Fulton, October 2.
- OEPA, 1989. Letter from Dan Fisher to Richard Cheney, Fulton, October 2.
- OEPA, 1991a. Consent Order Between the State of Ohio and Fulton, Filed July 9.
- OEPA, 1991b. Letter from Janet Leite Miller to Tom Gleckler, Fulton, July.
- U.S. Department of Agriculture (USDA), 1984. Soil Survey of Fulton County Ohio, October.
- EPA, 1989a. Letter from Paul Dimock to Tom Gleckler, Fulton, April 14.
- EPA, 1989b. Letter from Paul Dimock to Tom Gleckler, Fulton, September 28,
- U.S. Geological Survey, 1971. Wauseon Quadrangle, Wauseon, Ohio, 7.5-Minute Series Topographic Map, Photoinspected 1977.

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ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12





### POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION							
01 STATE	02 SITE NUMBER						
OH	OHD 094 R10 738						

			######################################		AND 111		
II. SITE NAME AND LOCATION							
01 SITE NAME (Legal, common, or descriptive name of site)		02 STREET	, ROUTE NO., OF	SPECIFIC LOCA	TION IDENTIFIER		
Fulton Industries, Inc. (Fulton)		135 East Linfoot Street					
03 CITY		04 STATE	05 ZIP CODE	06 COUNTY	07 COUNTY	08 CONG	
					CODE	DIST	
Wauseon		он	43567	Fulton			
09 COORDINATES: LATITUDE LONGITUDE							
4 1° 3 3′ 3 7″. N   0 8 4° 0 8′ 3 5	5". W						
10 DIRECTIONS TO SITE (Starting from neerest public road)							
Route 108 south from the Ohio Turnpike to Wauseon, turn left (eas	st) on Linfoot :	Street; faci	ity is on the left			10 Lyen at 17 Lyen at 17 Lyen at 18 Lyen at	
400-10-11-11-11-11-11-11-11-11-11-11-11-1			A				
III. RESPONSIBLE PARTIES							
01 OWNER (if known)		02 STREET	(Business, mailín	g residential)	······································		
Richard Volk		135 East L	infoot Street			9	
03 CITY		04 STATE	05 ZIP CODE	06 TELEPHONE	NUMBER		
Wauseon		он	43567	(419) 335	-3015		
07 OPERATOR (If known and different from owner)		08 STREET	(Business, mailin	g, residential)			
O9 CITY		10 STATE	11 ZIP CODE	12 TELEPHONE	NUMBER		
				( )			
13 TYPE OF OWNERSHIP (Check one)	!		THIN-Street	L	***************************************		
A. PRIVATE  B. FEDERAL:  (Agency name)		□С	STATE	D. COUNTY	D E. MUN	ICIPAL	
F. OTHER (Specify)		G. UNK	NOWN				
14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)							
A. RCRA 3010 DATE RECEIVED: 08 / 08 / 80 B. UNI	CONTROLLED	WASTE SI	TE (CERCLA 103	c) DATE RECEI	VED: /		
					MOITH DAT		
IV. CHARACTERIZATION OF POTENTIAL HAZARD  O1 ON SITE INSPECTION  BY (Check all that apply)	**************************************						
	PA CONTRAC	TOR	D C. STATE	□ D. O	THER CONTRACT	or I	
YES DATE 1/21/92 DE. LOCAL HEALTH OF	FICIAL	F. OTH	ER:				
	DD 0 5 '			(Specify)			
CONTRACTOR NAME(S):		***************************************					
02 SITE STATUS (Check one)	03 YEARS	OF OPERA	TION				
M A. ACTIVE D B. INACTIVE D C. UNKNOWN		45 IING YEAR EN	Present	□ UNKN	OWN		
AA DEGODOTTON OF GUIDET ANOTO COOOLD V DOSOSNET	1	ING TEAN EN	DING YEAR				
04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN,		~~~				C. O. C.	
The Fulton facility generates three waste streams: wastewater treatr	ment sludge (I	-006), non	hazardous waste	oil, and scrap r	netal.		
						Car Copy and a second	
	h-10						
05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND	OR POPULAT	TION				a de la company	
Release of electroplating wastewater to on-site soils						9	
V. PRIORITY ASSESSMENT			•		and the state of t		
01 PRIORITY FOR INSPECTION (Check one. If high or medium is che	ecked, comple	te Part 2 -	Waste Information	on and Part 3	Description of Haz	ardous Conditions and	
Incidents.)	•						
🗖 A. HIGH 🔞 B. MEDIUM	C. LOW		<b>12</b> D	, NONE			
(Inspection required promptly) (Inspection required)	(Inspect on	time availa	ble basis) (No	further action ne	eded; complete cu	rrent disposition form)	
VI. INFORMATION AVAILABLE FROM	er en en state de la completa del completa de la completa del completa de la completa del la c	- Postor Attack					
01 CONTACT   02 OF (Agency,	/Organization)			THE HOLD WAS A STREET OF THE STREET	<del></del>	03 TELEPHONE NUMBER	
Kevin Pierard U.S. EPA Regio						(312) 886-4448	
04 PERSON RESPONSIBLE FOR ASSESSMENT 05 AGENCY		06 ORGAN	IZATION	07 TELEPHONE	NUMBER	08 DATE	
Michael Keefe		PRC EMI		(312) 856-870		01 / 16 / 92	
						MONTH DAY YEAR	

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			*3
			*3
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#### POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 2 - WASTE INFORMATION

	IDENTIFICATION							
01 STATE	02 SITE NUMBER							
OH	OHD 094 810 736							

II. WASTES	STATES, QUANTITIES, AND CH	ARACTERISTICS			NAME OF A	wer/anyummunikanikanikanikanikanikanikanikanikanika		
	TATES (Check all that apply)		02 WASTE QUANTITY AT SITE			03 WASTE CHARACTERISTICS (Check all that apply)		
A. SOLI	D	(Measures	(Measures of waste quantities must be independent)			C A. TOXIC D H. IGNITABLE		
□ B. POW 図 C. SLU	DER, FINES <b>10</b> F. LIQUID DGE <b>13</b> G. GAS	TON				B. CORROSIVE  C. RADIOACTIVE	I. HIGHLY VOLATILE  J. EXPLOSIVE	
D D. OTH			ARDS	d. d. de		D. PERSISTENT  E. SOLUBLE	K. REACTIVE L. INCOMPATIBLE	
<b>∞</b> 2. €111	(Specify)	***			ı	F. INFECTIOUS	M. NOT APPLICABLE	
		NO. OF C	DRUMS			G. FLAMMABLE		
III. WASTE T	YPE				otod box		AND	
CATEGORY	SUBSTANCE NAME	01 GROSS AMOUNT	02 UNIT OF MEASU	RE 03	COMN	MENTS	, , , , , , , , , , , , , , , , , , , ,	
SLU	SLUDGE	26	cubic yards	Waste	ewater	treatment siudge (F00	6)	
OLW	OILY WASTE	40	55-gallon drums	Vonha	az ardou	ıs waste oil		
SOL	SOLVENTS						**************************************	
PSD	PESTICIDES						With the terror to the terror	
occ	OTHER ORGANIC CHEMICALS							
IOC	INORGANIC CHEMICALS							
ACD	ACIDS							
BAS	BASES							
MES	HEAVY METALS					W.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,		
IV. HAZARI	OOUS SUBSTANCES (See Apper	ndix for most frequ	iently cited CAS N	umbers	1			
01 CATEGORY	02 SUBSTANCE NAME	03 CAS NUMBER	04 STORAGE/DISPO	SAL ME	THOD	05 CONCENTRATION	06 MEASURE OF CONCENTRATION	
	-LADAHIMATES-MANAGENTALASIN GALAMATAN AND AND AND AND AND AND AND AND AND A		The section of the se					
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	TA-0346							
			entitue.					
							2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-2000-20	
	Andibilitation						The state of the s	
	CKS (See Appendix for CAS Nu							
CATEGORY	01 FEEDSTOCK NAME	02 CAS NUMBER	CATEGORY		01 FE	EDSTOCK NAME	02 CAS NUMBER	
FDS			FDS					
FDS			FDS					
FDS		A Committee of the Comm	FDS			THE PROPERTY OF THE PROPERTY O		
FDS			FDS				, , , , , , , , , , , , , , , , , , , ,	
VI. SOURCE	S OF INFORMATION (Cite spec	rific references; e.g	g., state files, samp	ole anai	lysis,	reports)		
Ohio Env	ironmental Protection Agency (	DEPA) and EPA Re	egion 5 RCRA files	and VS	61			
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# POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

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01 STATE 02 SITE NUMBER OH 0HD 094 810 736

. HAZARDOUS CONDITIONS AND INCIDENTS			
01 D A. GROUNDWATER CONTAMINATION	02 D OBSERVED (DATE: )	D POTENTIAL	□ ALLEGED
03 POPULATION POTENTIALLY AFFECTED:	04 NARRATIVE DESCRIPTION		
anna Alicidationi			
None			
01 D B. SURFACE WATER CONTAMINATION	02 D OBSERVED (DATE:)	D POTENTIAL	Q ALLEGED
03 POPULATION POTENTIALLY AFFECTED:	04 NARRATIVE DESCRIPTION		
None			
770110			
01 C. CONTAMINATION OF AIR	02 D OBSERVED (DATE:)	☐ POTENTIAL	O ALLEGED
03 POPULATION POTENTIALLY AFFECTED:	04 NARRATIVE DESCRIPTION		
None			
	0.0		CONTROL OF THE PROPERTY OF THE
01 D. FIRE/EXPLOSIVE CONDITIONS 03 POPULATION POTENTIALLY ASSECTED:	02 O OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	2 POTENTIAL	O ALLEGED
03 POPULATION POTENTIALLY AFFECTED:	OF IMPURATINE DESCRIBITION		
None			
01 D E. DIRECT CONTACT	02 D OBSERVED (DATE:)	□ POTENTIAL	D ALLEGED
03 POPULATION POTENTIALLY AFFECTED:	04 NARRATIVE DESCRIPTION		
None			
01 8 F. CONTAMINATION OF SOIL	02  OBSERVED (DATE: 1985 )	□ POTENTIAL	O ALLEGED
03 AREA POTENTIALLY AFFECTED: 1	04 NARRATIVE DESCRIPTION	= + OTENTIAL	₩ ALLEGED
(Acres)			
Surface soils under and surrounding a wastewater trea			
contaminated soil was excevated until concentrations we	ere equivalent to background levels. CEPA approv	ed closure of this unit in 1986.	
OA ET C. DOINWING MATER CONTANTINE	A2 B ODCCOVID IN LTC	E DOTENTIAL	27 111 17 27 2
01 D G. DRINKING WATER CONTAMINATION 03 POPULATION POTENTIALLY AFFECTED:	02 D OBSERVED (DATE:) 04 NARRATIVE DESCRIPTION	POTENTIAL	ALLEGED
03 ; OF OLD HON FORENTIALET AFFECTED:	CA MARIAMINE DESCRIPTION		
None			
01 M H. WORKER EXPOSURE/INJURY	02 OBSERVED (DATE:)	POTENTIAL	ALLEGED
03 WORKERS POTENTIALLY AFFECTED:100	04 NARRATIVE DESCRIPTION		
During the VSI, the ambient concentration of SO <sub>2</sub> in the v	vastewater treatment plant (WWTP) was high enou	igh to cause coughing and respi	ratory discomfort among
members of the PRC inspection team.			
			- A ( )   P -> - A   P -
01 D I. POPULATION EXPOSURE/INJURY	02 D OBSERVED (DATE:)	O POTENTIAL	□ ALLEGED
03 POPULATION POTENTIALLY AFFECTED:	04 NARRATIVE DESCRIPTION		
None	•		
149119			

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## POTENTIAL HAZARDOUS WASTE SITE PRELIMINARY ASSESSMENT PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

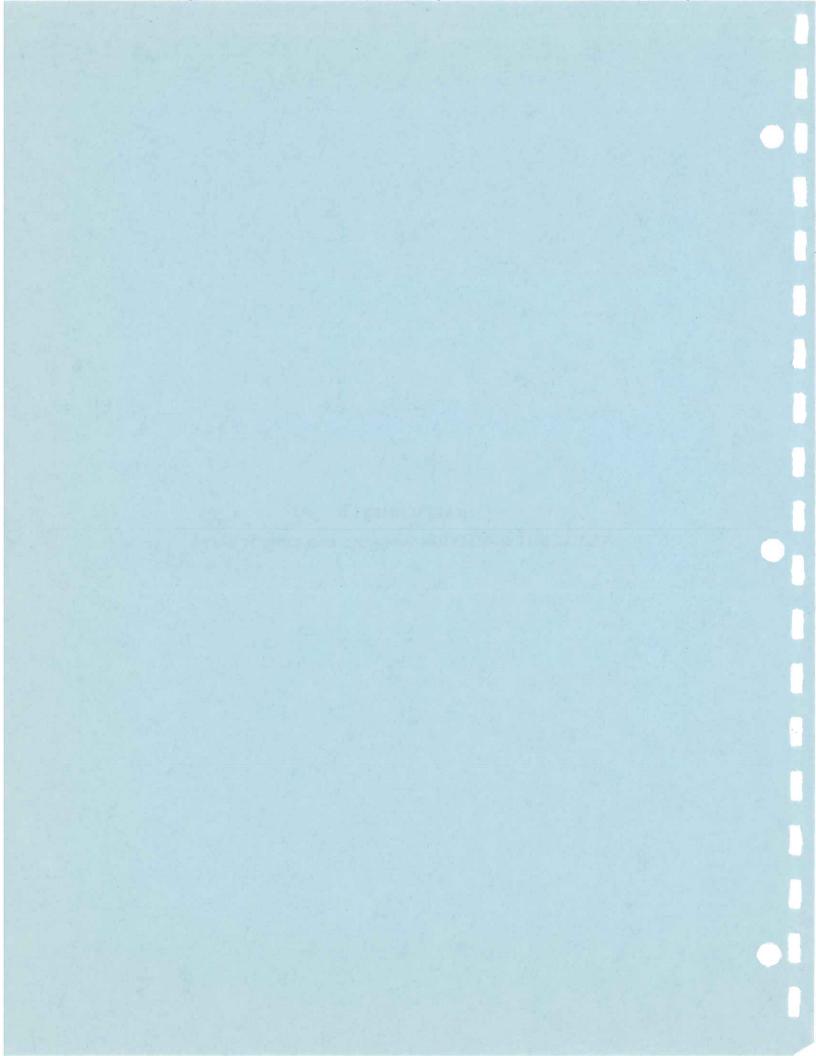
	IDENTIFICATION						
01	STATE	02 SITE NUMBER					
	OH.	000 004 010 724					

II. HAZARDOUS CONDITIONS AND INCIDENTS	(Continued)		
01 D J. DAMAGE TO FLORA  04 NARRATIVE DESCRIPTION	02 D OBSERVED (DATE:)	D POTENTIAL	D ALLEGED
The second secon			
None			
01 M K. DAMAGE TO FAUNA	02 D OBSERVED (DATE: 11/08/82)	I POTENTIAL	□ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of sp.	ecies)		
An unknown quantity of electroplating wastewater	was released to the sanitary sewer and eventually to	the North Turkey(not Creek	Five miles of the great war
affected and fish kills were observed.		die Heiti Falkey est Greek.	Tive limes of the creek wan
01 L. CONTAMINATION OF FOOD CHAIN	02 OBSERVED (DATE:)	D POTENTIAL	ALLEGED
04 NARRATIVE DESCRIPTION			
M			
None			
01 DM. UNSTABLE CONTAINMENT OF WASTES	02 D OBSERVED (DATE: )	D POTENTIAL	D ALLEGED
03 POPULATION POTENTIALLY AFFECTED:	04 NARRATIVE DESCRIPTION	_ , o, Emine	≈ ∨rrrgtb
None			
1947-1950-1954 Ave.			
01 D N. DAMAGE TO OFF-SITE PROPERTY  04 NARRATIVE DESCRIPTION	02 D OBSERVED (DATE:)	D POTENTIAL	O ALLEGED
OF INVESTINE DESCRIPTION			
None			
01 8 O. CONTAMINATION OF SEWERS, STORM DRAI	NS, WWTPS DOBSERVED (DATE: 11/08/82)	D POTENTIAL	□ ALLEGED
04 NARRATIVE DESCRIPTION			
An unknown quantity of electronisting washowater	trace released to the emission of the contract	an and a second to the second to	
bypass valves to divert the release to North Turkey	was released to the sanitary sewer. The sanitary sew ripot Creek.	er reached its capacity during	the release causing automati
-,,			
01 P. ILLEGAL/UNAUTHORIZED DUMPING	02 D OBSERVED (DATE:)	D POTENTIAL	O ALLEGED
04 NARRATIVE DESCRIPTION			
None			
OS DECCRIPTION OF ANY OTHER MACHAIL POTENTIA	1. OD ALL COCO	W. W	
05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIA  None	IC, OH ALLEGED HAZARDS		
III. TOTAL POPULATION POTENTIALLY AFFECTI	ED: 6.500	· · · · · · · · · · · · · · · · · · ·	
IV. COMMENTS			
	The state of the s	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
None			
V. SOURCES OF INFORMATION (Cite specific re	eferences; e.g., state files, sample analysis	, reports)	
			**************************************
OEPA and EPA Region 5 RCRA files	Ž		
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ATTACHMENT B

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS



#### VISUAL SITE INSPECTION SUMMARY

Fulton Industries, Inc. (Fulton) Wauseon, Ohio OHD 094 810 736

Date:

January 21, 1992

Facility Representatives:

Ned Griggs, Fulton Tom Gleckler, Fulton

Inspection Team:

Michael Keefe, PRC Environmental Management, Inc. (PRC)

David Berestka, PRC

Photographer:

Michael Keefe

Weather Conditions:

Sunny, 35°F, about 4 inches of snow on the ground

Summary of Activities:

The visual site inspection (VSI) began at 9:30 a.m. with an introductory meeting. Mr. Keefe began the meeting by describing the purpose of the VSI and the agenda for the visit. Mr. Griggs and Mr. Gleckler then gave a brief overview of Fulton's products. The meeting continued with a discussion of facility operations and

waste management practices.

The tour of the facility commenced after the introductory meeting at about 10:40 a.m. The tour began with a walk through the metal stamping areas, followed by a tour of the electroplating division and the wastewater treatment plant (WWTP). The inspection team returned to the facility office area at 12:15 p.m. to review the information gathered during the inspection and concluded the VSI with a short exit meeting. The VSI was completed at 1:00 p.m.

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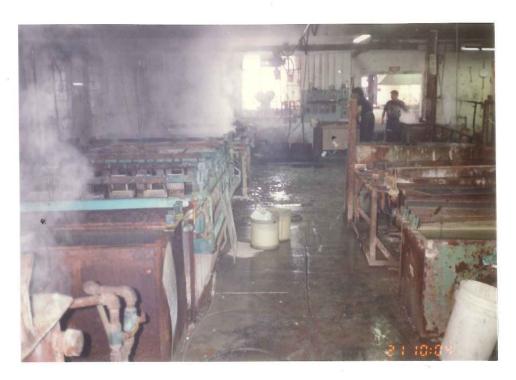
Photograph No. 1
Orientation: East
Date: 1/21/92
Description: Electroplating wastewater trench system near the baker zinc automatic line; the

trench carries wastewater to the WWTP



Photograph No. 2 Orientation: South Location: SWMU 1 Date: 1/21/92

Description: Electroplating wastewater trench system near the baker zinc automatic line; the trench carries wastewater to the WWTP



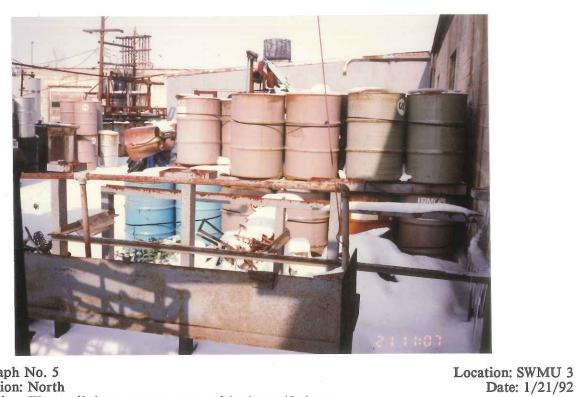
Photograph No. 3 Location: AOC 2 Orientation: East Date: 1/21/92

Description: Deteriorating concrete floor at east end of the zinc barrel line in background



Photograph No. 4 Orientation: South Description: Units in the scrap metal storage area

Location: SWMU 4 Date: 1/21/92



Photograph No. 5 Orientation: North Description: Waste oil drum storage area with about 40 drums



Photograph No. 6 Orientation: West

Location: SWMU 1 Date: 1/21/92

Description: Metal grates covering below ground treatment basins in foreground; sludge flocculation and sedimentation unit in background



Photograph No. 7 Orientation: Northwest Description: Sludge separator in middle background; filter press at right



Photograph No. 8 Orientation: North Description: Wastewater treatment sludge (F006) storage unit

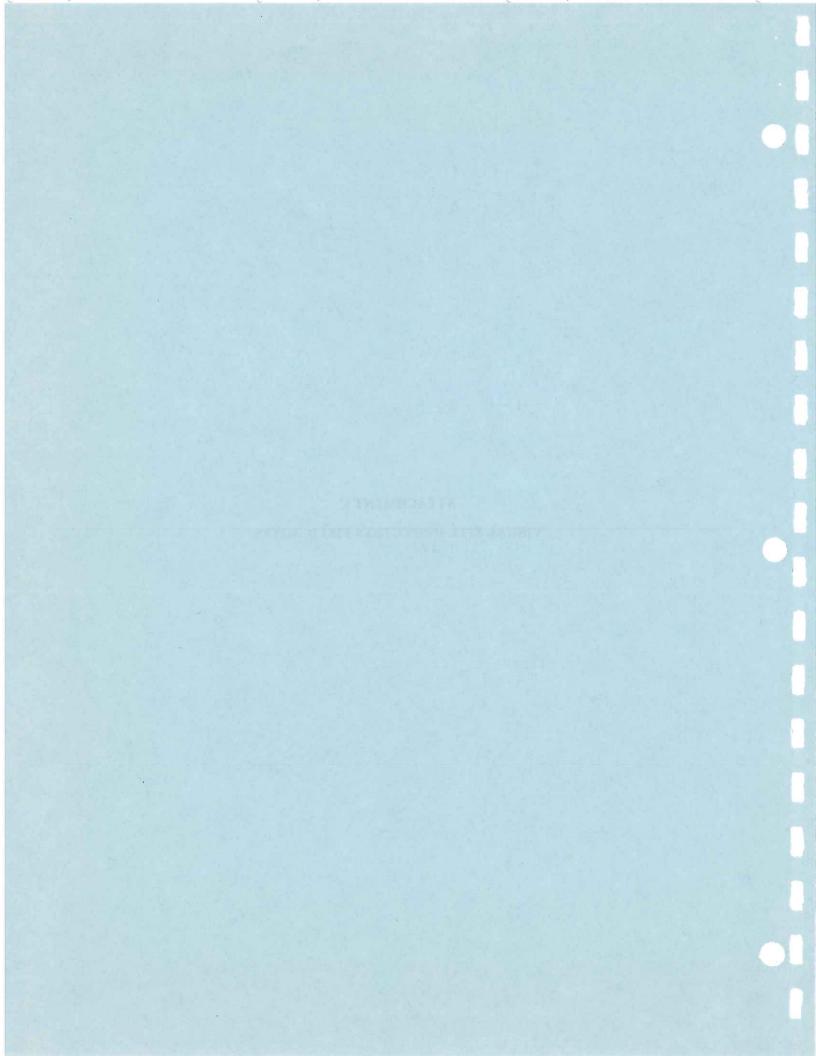
Date: 1/21/92



Photograph No. 9 Orientation: Northeast Description: Former sludge waste pile area

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ATTACHMENT C
VISUAL SITE INSPECTION FIELD NOTES





(1) Stamping Dinsing	- Synthetic latericanta add to princes	On successing. This ends up in cleaning	bethe on plates die. I Sh parts was how,	This is to only solvent on site	5 Lap metal ucycled and sold-	varied accord to A	5km) ) (	Mass ( dan & know annual polo	Supplies	Harlin Steel		Water soluble only on 11m feel bosons for	Machian oil , no other significant waste	or generation			
Now Zinc Mayor	atria			Full 1983, Some aport 1884	2		3 DIMSIONS:	(1) An tomothe Metal Stamping	(3) Flashlights Dinson	(3) Plating DWAGA	Eas h have been own coeperal base.	14-16 milling you total solar		No mare CN baths in plating division	Al solating division 1° 200 plating	also the prosphoring	



WATE mlnow 1979; byon hat batch strang to be both of waveful of west min to see your floor min as from the function of function of function of function of functions.	West in shonground sits. These were subjust last year (jathed, mainthunes) concrete	No madery, No platny tapes -song waste stream is foot	Stabiling the disposal of lest lott, Stabiling the disposal Starod - a de yand well of by: 13- 15 this of making every 5-5 weeks	Exper every 3.4 weeks a full well of well of well of the stage Environments - Indianguish
(2) Flashish Division, bounded flashights some muth formy lay. Futton bound the stranging, but to bound the stranging of was to assent the session of the division. We wastessteams from this division.	3 Hating Division see marked my	Rack Boul In automate chamic acid used lyon dead was do and was take people segments to worth	Therebas Thoughout This division d'Unin to WWTP au Clarie, and, 2 inc words go mongh tronch system, also	

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Tanks 1 - Well 2-125h - with adustri- warr CA destucto whole (889 & colorination Eldsten half tought in 1882 from Essex Wine Most flathlights to government Full on / tanks - sulled a and FODG Studes a scrap maken Paper trach wolly to Landfill 3,00 / caush sola (80 2) 4 502 A Chamatrachand platory dep: public 516d 2 ~ mid 1980a « Carolhand barbes Lab- no lab packs This is all and had Alex are in he lab of making diety emerger have . Our plant shurkleren all flued 3: to emergency holders tout. This is menitored out ha shout Ch on sale of the WONTP 6 goller Bine phospack study is generaled bust is small amorate 30 to Watt Eny) drums racks in drum area Filter pues: 15 of for fuller sources No contained stronger areas Mut sury a high land. put into wwith

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We slad las , lots of worsign orneally tubes, Rivar well spelled to foor to have to sure to Hand do the black conon. That solded of to well to 5 days of all caush lower Midden as Bone, and church marchined Bola py : up . A Peter S 10 Much Chimy 2 tens 15 ages, 175,000 ft worksport and (after Closure) was asserted what pla removed in 1982 The \* Walt Twanger @ 10:40 Waley solubel on in stamping Arans to Guspins for addain P. le Segan in 1979-1882 Dishing water form and a los employes ( 16/2) (mostly worth cornect 200, 50 for presses 10 .. platy 45 for presses 177

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ende de la companya d

Site is fence at banker Suire out buck West of the grown of land drums of cleans sludge to Tobe hopped PL of aush. dung 13,4 N. waste pil Laticoff! Security along system monglow Clauffer palymen god Warally uns day fact Coughing - 5C2 Alt at postment defumin How Most from das weed by spape lugues is not going leterorated - pasself 6 on - 50 L Hot of hand dyning goeration this for removed - clean Generally, very pow enderon Band line area flor vey Anorybont in back stopen. Poolant drum's Easthrow PI Est Bull and and stripping macks,

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and showhing is still there, this intoduces made amound of mostly to the worth building was form down ) An concerte floor & women't hast agen is still theredae & long Creams pucks oy ordinable of the Steel (boue) a plated steel ( haveny P N | 40 dams / soduela Stacked on particles 2 hay and and sule VOLAND WILLIAMS VERA-COLUMBUS 614-644-2084 for sp.11s man of complete, where Post non 2 dues month. of work to was No 2 contest ment Release used plant to write bose (bufore eng. Wolds fant), volue let bose to new or new or need por Hagin \* Chrome spill in 1983-1984 to No reportable releases since 1983 Residence geros un fort -> closest Tusky foot creek to Maymen Would an use wells and respiece Lugs quark & surretor 65 populatur ~ 6500 ROTH permit 6-10 Exp. 185 May 1994 Myel area

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				4.
				90 A 2
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# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY ECEIVED

## REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

WMD PECORD CENTER

SEP 11 1905

REPLY TO THE ATTENTION OF:

HRE-8J

January 13, 1992

Mr. Tom Gleckler Fulton Industries 135 East Linfoot Street Wauseon, OH 43567

Re:

Visual Site Inspection Fulton Industries OHD 094 810 736

Dear Mr. Gleckler:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) and to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for January 21, 1992 at 9:30 a.m. The inspection team will consist of Michael Keefe and Dave Berestka of PRC Environmental Management, Inc., a contractor for the U.S. EPA. Representatives of the Ohio Environmental Protection Agency (OEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

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The U.S. EPA recommends that personnel who are familiar with present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

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Kevin M. Pierard, Chief

OH/MN Technical Enforcement Section

Enclosure

cc:

Janine Seacord, OEPA - Columbus Jeff Wander, OEPA - Bowling Green



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

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#### ATTACHMENT I

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

PRC requests that, if available, the following facility information be provided during the VSI:

- 1. Two copies of a detailed map of the facility
- 2. Facility history, including dates of operation, ownership changes, and production processes
- 3. Current facility operations
- 4. Processes that generate waste that is treated, stored, or disposed of at the facility
- 5. Records of disposal of wastes generated at the facility (manifests, annual reports, etc...)
- 6. Security at the facility
- 7. Information regarding geology and the uses of ground water and surface water in the area
- 8. Permits (air, NPDES, etc...) the facility currently holds or has held in the past and documentation of any permit violations that may have occurred
- 9. Records of any spills that may have occurred at the facility
- 10. Descriptive operational information (location, dimensions, capacity, materials of construction, etc...), dates of start-up and closure, wastes managed, release controls, and release history for each SWMU